non-responsive

August 26,

Mr. Michael Ohm U.S. EPA Region V Waste Management Branch 230 S. Dearborn Street Chicago, IL 60604

Dear Mr. Ohm:

I am writing to you as both a concerned citizen and an active member of the Central Ohio Group of the Sierra Club.

I read with interest a recent newspaper report on your agency's public hearing regarding Columbus Coated Fabric Co.'s petition for a hazardous waste storage permit. I wish to register my support for Mr. Michael J. Pompili's findings and urge your organization to withhold issuing the permit until Columbus Coated has thoroughly complied with the U.S. EPA rules. Mr Pompili was very clear and thorough in pointing out areas of noncompliance by Columbus Coated and I think it is very important that you investigate each item and make sure that the sub standard activity is corrected. Furthermore, since Columbus Coated is located amidst residential property and so close to schools, I think the Columbus Health Department recommendations deserve careful consideration. If it is possible for you to withhold the permit until Columbus Coated has complied with the Health Department recommendations in addition to the EPA guidelines, I urge you to do so. Careful scrutiny at this stage can protect against unspeakable desaster down the road.

Thank you for your attention to this matter.

Ronald P. Zelizer

RECEIVED

WASTE MANAGEMENT BRANCH non-responsive

Dr. mr. Ohm.

ohoved not even have to ask for tight federal, contrals on a hozordown worte storage faithty at 1280 n. Arout ave. Columbus. Okio.

a population center that night require evacuation of the people in that area it should not be allowed in out an area.

we cak gown help in getting reeded regulations porced, to ray the least - Better removed such hogardown waste to an isolated place. Borden con stand The cost. If not they can raise milks, and what not we cont affort the riok.

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4 Aurust 1984

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11-57



Mr. Michael Ohm U.S. EPA Region V Waste Management Branch 230 S. Dearborn St. Chicago IL 60604

Dear Mr. Ohm:

SUBJECT: COLUMBUS COATED FABRICS HAZARDOUS WASTE STORAGE FACILITY AT 1280 N GRANT

Before Columbus Coated Fabrics should be granted any Resource Conservation and Recovery Act permit, they should be required to correct plant deficiencies mentioned in Michael Pompili's statement at the July 26 hearing. The permit application should describe employee emergency training plans and also plans for briefing local public safety and medical professionals. Nearby property owners and residents should receive notification that accidents at the facility could cause them to be evacuated.

Few people are aware of the risks posed by hazardous wastes in our environment. However, I am convinced that if people had known about it, there would have been more attending the July 26 hearing. How was the hearing publicized? I'm a well-informed Columbus citizen, yet I was not aware of the hearing until after the fact. Was it held in the evening, when working people could attend? If not, it was not much of a public hearing.

I would appreciate receiving more information on the facility and on the plans for requiring it to follow more stringent regulations.

Please add my name and address to your public information mailing list so that I will receive notices of future hearings involving Central Ohio issues. Thank you for your consideration of these comments and for any information you can send regarding the issues I've mentioned.

Sincerely,

Barbara Covert

Barbara Covert

BRANCH WAT

	CONVERSATION	RECORD	2:20 p.m	. DATE 7/1	0/89
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James Mentel

Colombus Coated Fabrics Roiden Chemical, Borden Inc. confee 1280 N. Grant Ave. Columbus, OH. 432/6

William G. Ilg



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OHIO MAILING LIST MAY 1984

LEGEND

ZONES	COUNTIES		
1	Allen, Defiance, Fulton, Hancock, Henry, Lucas, Ottawa, Paulding, Putnam, Van Wert, Williams, Wood		
2	Ashland, Crawford, Huron, Knox, Marion, Morrow, Richland, Sandusky, Seneca, Wyandot		
3	Ashtabula, Cuyahoga, Geauga, Lorain		
4	Medina, Portage, Stark, Summit, Tuscarawas, Wayne		
5	Carroll, Columbiana, Jefferson, Mahoning, Trumbull		
6	Auglaize, Champaign, Clark, Darke, Greene, Hardin, Logan, Mercer, Miami, Montgomery, Preble, Shelby		
7	Delaware, Fairfield, Franklin, Licking, Madison, Perry, Pickaway, Union		
8	Belmont, Coshocton, Guernsey, Harrison, Holmes, Monroe, Morgan, Muskingham, Noble, Washington,		
9	Adams, Brown, Butler, Clermont, Clinton, Hamilton, Highland, Warren		
10	Athens, Fayette, Gallia, Hocking, Jackson, Lawrence, Meigs, Pike, Ross, Scioto, Vinton		
CODE	TYPE OF COVER LETTER FOR MAILING		
RED	DRAFT PERMIT		
YELLOW	POLITICAL		
GREEN	PUBLIC INTEREST GROUPS		
BLUE	REGULAR FACT SHEET OR STATEMENT OF BASIS ONLY		

Honorable Dana Rinehart Columbu City Hall 90 West Broad Street Columbus, Ohio 43215

Jerry Hanmond President of City Council 90 West Broad Street Columbus, Ohio 43215

Donald Werner Chief of Fire Department 200 Greenlawn Avenue Columbus, Ohio 43215

Dwight Joseph Chief of Police 120 West Gaye Street Columbus, Ohio 43215

City Clerk Fran Ryan 90 West Broad Street Columbus, Ohio 43215

County Commissioner Hugh DeMoss 410 South High Street Columbus, Ohio 43215

County Clerk
Barbara Carter
410 South High Street
Columbus, Ohio 43215

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Honorable Howard Metzenbaum United States Senate 347 Russell Office Building Washington, D.C. 20510

Honorable Thomas Luken United States House of Representatives 2342 Rayburn Office Building Washington D.C 20515

Honorable Willis Gradison United States House of Representatives 2311 Raybrun Office Building Washington, D.C. 20515

Honorable Tony Hall United States House of Representatives 1728 Longworth Office Building Washington, D.C. 20515

Honorable Michael Oxley United States House of Representatives 1108 Longworth Office Building Washington, D.C. 20515

Honorable Delbert Latta United States House of Representatives 2309 Rayburn Office Building Washington, D.C. 20515

Honorable Bob McEwen United States House of Representatives 329 Cannon Office Building Washington, D.C. 20515

Honorable Michael DeWine United States House of Representatives 1407 Longworth Office Building Washington, D.C. 20515 Honorable Thomas Kindness
United States House of [___resentatives
2417 Rayburn Office Building
Washington, D.C. 20515

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Honorable Clarence Miller United States House of Representatives 2208 Rayburn Office Building Washington, D.C. 20515

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Honorable John Kasich United States House of Representatives 1724 Longworth Office Building Washington, D.C. 20515

Honorable Donald Pease United States House of Representatives 1127 Longworth Office Building Washington, D.C. 20515

Honorable John Seiberling United States House of Representatives 1225 Longworth Office Building Washington, D.C. 20515

Honorable Chalmers Wylie United States House of Representatives 2310 Rayburn Office Building Washington, D.C. 20515

Honorable Ralph Regula United States House of Representatives 2209 Rayburn Office Building Washington, D.C. 20515 Honorable Lyle Williams United States House of Rep sentatives 1004 Longworth Office Building Washington, D.C. 20515

Honorable Douglas Applegate United States House of Representatives 2464 Rayburn Office Building Washington, D.C. 20515

Honorable Edward F. Feighan United States House of Representatives 1223 Longworth Office Building Washington, D.C. 20515

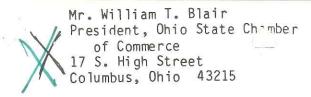
Honorable Mary Rose Oaker United States House of Representatives 2436 Rayburn Office Building Washington, D.C. 20515

Honorable Louis Stokes United States House of Representatives 2465 Rayburn Office Building Washington, D.C. 20515

Honorable Neal Zimmers President Pro Tempore Ohio Senate State House Columbus, OH 43216

Honorable Vern Riffe Speaker of the House Ohio House of Representatives State House Columbus, OH 43216

Honorable David Leland Ohio House of Representatives Committee on Energy and Environment State House Columbus, OH 43216





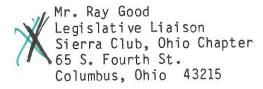
Mr. Doug Trail Ohio Manufacturer's Association 100 E. Broad Street Columbus, Ohio 43215



Ms. Channy Brokaw President League of Women Voters of Ohio 65 S. Fourth St. Columbus, Ohio 43215



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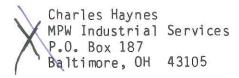
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Maureen Sullivan
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Don Ryan, Chief, Fire Prevention State Fire Marshall 8895 E. Main St. Reynoldsburg, OH 43068

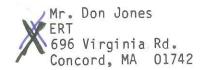
Steve Sedam
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William Mattox, Deputy
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Division of Water
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Honorable Eugene Branstool, Chairman Sen. Energy Natl. Res and Env. Comm. State House Columbus, OH 43215

Sandy Buchanan
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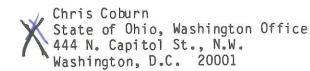
Jane Haynes, Executive Director
Ohio Alliance for Env. Education
445 King Ave.
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Honorable Cooper Snyder Ohio Senate State House Columbus, OH 43215



Glenn Stevenson Legislative Services Comm. State Houses Columbus, OH 43215

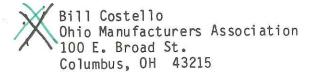


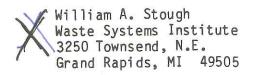


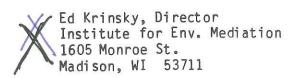
Dan Chatfield ODH 246 N. High St., 6th Floor Columbus, OH 43215

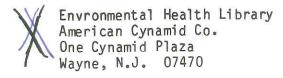


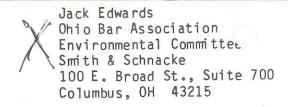
Marcia Cooper Legislative Services Committee State House Columbus, OH 43215





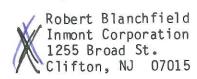








Jan Lanier Ohio Nurses Association P.O. Box 13169 Columbus, OH 43213



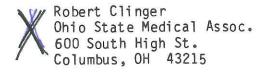


Brian Warsham Enviro Data Systems, Inc. P.O. Box 723492 Atlanta, GA 30339



Steven M. Hindall District Chief U.S. Geological Survey 975 West Third Ave. Columbus, OH 43212





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Tom Benbow
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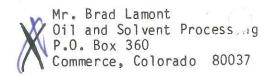


Phil Scott
Ohio Hazardous Waste Facility
Approval Board
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7



Mr. Kevin D. Grant SCA Chemical Services 5 Middlesex Ave. Somerville MA 02145



Mr. Ronald J. Benkert
Zaring Company
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8170 Corporate Park Dr.
Cincinnati, Ohio 45242



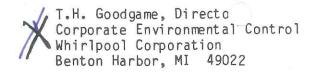
Ms. Linda M. Taschek Whitescarver Associates, Inc. P.O. Box 17088 Dulles International Airport Washington, D.C. 20041



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Dennis A. Huebner, Chief State Waste Programs Branch U.S. Environmental Protection Agency John F. Kennedy Federal Building Boston, MA 02203





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Hoover Company
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Mr. Howard Goldman Western Lake Erie Sierra Club 2643 Sherbrooke Toledo, OH 43606

Lorey Raggenkamp
Public Participation Coordinator
Ohio Environmental Protection Agency
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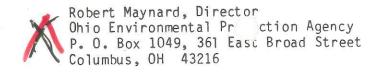
U.S. Environmental Protection Agency Office of Solid Waste 1-563) Rm. 256 401 M Street SW Washington, D.C. 20460

ATTN: Alex Wolfe

U.S. Fish and Wildlife Service Columbus Field Office 3990 East Broad Street Columbus, OH 43215

Ms. Charlene Dwin
Advisory Council on Historic Preservation
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Washington, D.C. 20005

Regional Administrator Deputy Regional Administrator Mary Ellen Lynch Connie Hinkle Kathy Brown



Charles J. Wilhelm, Chief
Division of Hazardous Materials Management
Ohio Environmental Protection Agency
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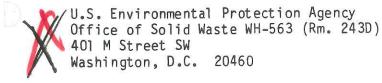
Bob Phelps, Chief Division of Industrial Wastewater Ohio Environmental Protection Agency P.O. Box 1049, 361 East Broad Street Columbus, OH 43216



B. Hodenbosi
PSD Permit
Air Programs
Ohio Environmental Protection Agency
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Peter Tweedt, Acting Director
Office of Ocean and Coastal
Resources Management
National Ocean Service
National Oceanic and
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3300 Whitehaven Street, N.W.
Washington, D.C. 20235



ATTN: Charles Miller

U.S. Environmental Protection Agency Office of Solid Waste WH-563 (Rm. 264G) 401 M Street SW Washington, D.C. 20460

ATTN: Steve Levy

Mr. Michael Colvin
Environmental Review Coordinator
ODNR
Office of Outdoor Recreation Services
Fountain Square, Bldg. A-3
Columbus, OH 43224

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John R. Garner
County Sanitary Engineer
75 Public Square
Cleveland, OH 44113

Eastgate Development & Trans.
Agency (EDATA)
Betty L. Sekula
123 Ewing Road
Youngstown, OH 44512

Environmental Resource Center James Cowden, Co-Director Environmental Studies Program Hiram College Hiram, OH 44234

House Energy and Environmental Committee The Honorable Thomas P. Gilmartin, Chairman State House Columbus, OH 43215

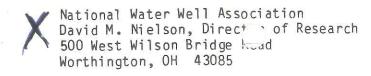
Jackson County Environmental Committee
Wallace H. Metcalf
2536 Pattonsville Road
Jackson, OH 45640

League of Ohio Sportsmen 4330 Cline Rd. S Columbus, OH 43228

Montgomery Co. Environmental Services Richard F. Brinkman, M.S. 6589 North Webster Street Dayton, OH 45414

> Canton Chamber of Commerce Environmental Committee Harold Emrick Hoover Company 101 East Maple Street North Canton, OH 44720

Denison University
Dr. Robert W. Alrutz
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One Sunset Hill
Granville, OH 43023





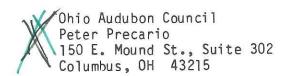
Northwest Region Committee on Special Waste Management James Hyland Dana Corporation 8000 Yankee Road Ottawa Lake, MI 49267.



Robert Wilkinson, Managing Director 20 South Front St., Suite 200 Columbus, OH 43215



Ohio Alliance for Environmental Education Jane Haynes, Executive Director 445 King Avenue Columbus, OH 43201





Ohio Bar Assoc. Environmental Committee Jaris F. Allen, Attorney Squire, Sanders & Dempsev 1800 Union Commerce Building Cleveland, OH 44115



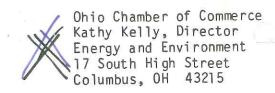
Ohio Bar Assoc. Environmental Committee Richard Fahey 550 E. Town Street Columbus, OH 43215



Ohio Bar Assoc. Environmental Committee Martin S. Seltzer, Attorney Porter, Wright, Morris & Arthur 37 West Broad Street Columbus, OH 43215



Goodyear Tire & Rubber Co. Fred C. Betzhold, Manager Chemical Environmental Protection 1144 East Market Street Akron, OH 44316



Ohio Chemical Council
Gerald Osterman
Super. Manufacturing Services
Monsanto Plastics and Resins Co.
River Road
Addyston, OH 45001



Ohio Contractors Association Ralph Church 1328 Dublin Road, Box 959 Columbus,OH 43216



The Ohio Cooperative Extension Service John Rohrer 2120 Fuffe Road Columbus,OH 43210



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Ohio Department of Energy Peter Kochman State Office Tower, 34th Floor 30 East Broad Street Columbus, OH 43215



Ohio Department of Health James K. Essman Bureau of Environmental Health 246 North High Street Columbus, OH 43215



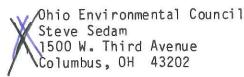
Ohio Department of Natural Resources Horace R. Collins Division Chief and State Geologist Division of Geological Survey Fountain Sq., Bldg. B Columbus, OH 43224



Ohio Department of Transportation Byrd Finley, Jr., Administrator Bureau of Environmental Services 25 South Front Street, Room 608 Columbus, OH 43215



Ohio Electric Utilities Institute Gary T. Sommerville Sr. Environmental Specialist Columbus & Southern Ohio Electric Co. 215 North Front Street Columbus, OH 43215





Ohio Federation of Women's Clubs Conservation Com. Chairman 417 Montreal Place Westerville, OH 43081



Ohio Fertilizer Pesticide Assoc., Inc. Tom Collins, Chairman of Hazardous Waste Commission Monsanto Agriculture Products Co. Bowling Green, OH 43402



Ohio Farm Bureau Federation Bruce Benedict, Dept. of Public Affairs 35 E. Chestnut Street, Box 479 Columbus, OH 43215 Ohio Forestry Associatio Inc. 665 East Dublin-Granville Road Suite 205 Columbus, OH 43229

American Council of Independent Labs
Daniel McIntyre
Columbus Water & Chemical Testing Lab
4628 Indianola
Columbus, OH 43214

X

American Society of Safety Engineers Laurie Jacques Owens-Corning Fiberglas Technical Center Box 415 Granville, OH 43023



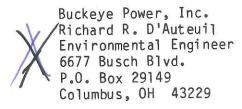
American Waterworks Association Rex Powers, Commissioner of Water and Wastewater Treatment 5350 Seaman Road Oregon, OH 43616



Association of Ohio Health Commrs. Ken Kerick, Vice President 108 South Park Avenue Fremont, OH 43420



Battelle Labs Richard Moffa 505 King Avenue Columbus, OH 43201





Ohio League of Women Voters Laura Evans Hazardous Substances Chairman 226 South Main Street Granville, OH 43023



Ohio Lung Association Braxton Tewart 1700 Arlingate Lane Columbus, OH 43228



Ohio Manufacturers' Association Doug Trail 100 East Broad Street Columbus, OH 43215



Ohio Municipal League Susan Cave 51 N. High Street, Suite 601 Columbus, OH 43215

Ohio Petroleum Council William Howard, Associate Director 88 East Broad Street, Suite 1960 Columbus, OH 43215





Ohio Sierra Club Ron Good/Janet Gentzler 65 South Fourth Street Columbus, OH 43215

Ohio State Medical Association
Dr. Samuel Lowery, Chairman
Environmental Liaison Committee
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Ohio Water Development Authority
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Columbus, OH 43215

Ohio Water Pollution Control Conference
Larry D. Moon
Secretary-Treasurer
Ohio EPA
P.O. Box 1049
Cojumbus, OH 43216

Public Utilities Commission of Ohio Bill Dixon, Director of Transportation 375 South High Street, 17th Floor Columbus, OH 43215

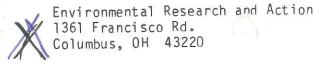
Public Utilities Commission of Ohio Ron Dunson, Chief of Enforcement Transportation Department 375 South High Street Columbus, OH 43215

Senate, Energy, Natural Resources & Environmental Committee
Sam Speck, Chairman
State House
Columbus, OH 43215

Water Management Association of Ohio Mark R. Rowland Burgess & Niple, Limited 5085 Reed Road Columbus, OH 43220

Water and Wastewater Equipment Mfg. James S. Keel, Jr. The Henry. P. Thompson Company 4866 Cooper Road Cincinnati, OH 45202

O.S. Department of Transportation Federal Highway Administration 200 N. High St., Rm 328 Columbus, OH 43215



ATTN: Von Hill

Institute for Environmental Education 8911 Euclid Avenue Cleveland, OH 44106

ATTN: Mary M. Roberts

Izaak Walton League of America Ohio Division 3026 Ranfield Rd. Kent, OH 44240

ATTN: Leslie Skuttle

League of Women Voters of Ohio 65 S. Fourth Street Columbus, OH 43215

Governor Richard Celeste Governor of Ohio State House Columbus, OH 43215

Izaak Walton League of America, Inc. (Ohio Division) 536 Schocalog Rd. Akron, OH 44320

Nature Conservancy (Ohio Office) 1504 W. First Avenue Columbus, OH 43212

> Ohio Academy of Science 445 King Avenue Columbus, OH 43201

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Mr. Julian Lewis
Executive Director
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Ms. Evelyn Stebhins Chairperson, Citizens for Clean Air & Water 514 Park Bldg, 140 Public Square Cleveland, Ohio 44114



Ms. Linda Greer Environmental Defense Fund 1525 18th Street, N.W. Washington, D.C. 20036



Common Cause 65 S. Fourth Street Columbus, OH 43215

SEPA UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION V

Date 7/25/89					
Name WILLIAM G. ILG					
Address Pio Box 208					
City COLUMBUS State OHIO Zp 43216					
Phone 225-6336					
Organization COLUMBUS CONTED FABRICS					
DO YOU WISH TO MAKE A STATEMENT?					
□YES ØNO					

SEPA	ENVIRONMENTAL AGENCY, REGION	PROTECTION V
	Date_	7/25
Name JANET	A. PEARL	
Address Colur	nous DISPAT	CH .
City Col	State <u>0440</u>	To 40015
Phone 461-5	255	10-13

DO YOU WISH TO MAKE A STATEMENT?

Organization _

DYES

MO

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION V

Name Eiteen A. Groves Asstcity Address 90 W. Broad City CULUMBUS Store Ohio Phone 614-222-7680 Organization Columbus City Atty OFFice

DO YOU WISH TO MAKE A STATEMENT?

DYES

DINO

EPA UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION V
Date 7/25/84
Name Gary Brown Address 181 S. WASHINGTON BUYO
City Columbus State OH Zip 43215 Phone 222-6197 Organization Columbus Health Dept.
DO YOU WISH TO MAKE A STATEMENT?

EPA UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION V

		Date	July 2	5, 1984
Name	Michael	J. T.	Smpile'	
	Cols H.D.			
City Cal	un buy som	• Chi	Zip .	43215
	14-222-6181			
Organization	Columbus	Health	Dept	
DO YOU I	WISH TO MAKE	A STATEM	ENT?	
	Q	YES	DNO	

EPA UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION V
Date 7 25 5
Name Dasks PERICINS (WTVN-TV)
Address 1261 Dublin Rd 43203
City (0 lum bus State D) Phone 253 441-6660
Organization WTUN (V.
DO YOU WISH TO MAKE A STATEMENT?

TYES

DHO



Date 7-75-84
Name HENTHER MACYENTIE Address 1261 Dublin Rd
City Columbia State Oh Zip 43216
Phone <u>YRI-6666</u> Organization <u>WTVN</u>
DO YOU WISH TO MAKE A STATEMENT?
□YES □NO

SEPA UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION V
Date 7/28/84
Name David A. De Prosposo
Address 2447 Shanghan Rd City Columbis State OH Zip 43220
Organization Columbus Coated Fabres.
DO VOIL WICH TO MAKE A STATEMENT?

DYES

MO

SEPA UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION V

Name Tom Heaton

Address 165 N. Washington Ave

City Columbus state OH Zp 43215

Phone (614) 225-4860

Organization Borden Inc

DO YOU WISH TO MAKE A STATEMENT?

SEPA	UNITED STATES ENVIRONMENTAL AGENCY, REGION	PROTECTION
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Name James Mentel

Address 410 S. HIGH ST.

City GOLS State OHIO TO 43215

Phone 462-3323

Organization ERBNKLIN GOUNTY COMMISSIONERS

DO YOU WISH TO MAKE A STATEMENT?

DYES

MNO



Date
For Berman + Ben Storley
The Til
City Colon 6-5 State OH Zip
Phone 460 - 3950
Organization
DO YOU WISH TO MAKE A STATEMENT?
DYES DNO

JUL 0 5 1984

Kirk Bishop Public Service Announcements WVKO-AM 4401 Carriage Hill Lane Columbus, Ohio 43220

Dear Hr. Bishop:

Per our telephone conversation on June 28, 1984, I am enclosing a Public Service Announcement regarding a hazardous waste permit that the United States Environmental Protection Agency (U.S. EPA), Region V, is considering issuing to Columbus Coated Fabrics, Columbus, Ohio. I appreciate your offer to provide information about the Columbus Coated Fabrics draft permit to citizens residing in the area.

Although pertinent facts about the public hearing were provided in the advertisements that the U.S. EPA purchased for broadcast on WBNS-AM and WRFD-AM for June 20, 1984, additional details about the draft permit are included in the enclosed announcement.

Also enclosed are copies of the Statement of Basis, the draft permit, and, the public notice that were published in the Columbus Dispatch on June 20, 1984.

Section 7004(b)(2) of the Resource Conservation and Recovery Act (RCRA) requires U.S. EPA to broadcast its intention to issue a hazardous waste permit over a local radio station. In order to demonstrate our compliance with this requirement, I would appreciate your completing the enclosed card and returning it to me.

Thank you for your assistance, and please contact me at (312) 886-1657, if you have any questions.

Sincerely,

Michael Ohm Environmental Protection Assistant

Enclosures

5HW:WMB:RAIU:M.OHM:M.OHM:6/29/84

Initials	Typist	Author	Other Staff	RAIU Chief	SPIS Secy.	SPIS Chief	WMB Chief	WMD Director
Date	6/29/84	6/29/34	Oth - Stail	12184	Sett Sety.	Store Chilef	-0744° Chiaf	WMD Gireriga

JUL 0 5 1984

Steve Lineberry
Public Service Announcements
WRFD-AM
Powell Road, Route 23
Columbus, Ohio 43285

Dear Mr. Lineberry:

Per our telephone conversation on June 28, 1984, I am enclosing a Public Service Announcement regarding a hazardous waste permit that the United States Environmental Protection Agency (U.S. EPA), Region V, is considering issuing to Columbus Coated Fabrics, Columbus, Ohio. I appreciate your offer to provide information about the Columbus Coated Fabrics draft permit to citizens residing in the area.

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Sincerely,

Michael Ohm Environmental Protection Assistant

Enclosures.

5HW:WMB:RAIU:M.OHM:M.OHM:6/29/84

Initials Date Typist Author WK9 84 Chief Staff Chief Staff Chief C

JUL 0 5 1384

Public Affairs WBNS-AM 62 East Broad Street Columbus, Ohio 43215

Public Service Department:

Per our telephone conversation on June 28, 1984, I am enclosing a Public Service Announcement regarding a hazardous waste permit that the United States Environmental Protection Agency-(U.S. EPA), Region V, is considering issuing to Columbus Coated Fabrics, Columbus, Ohio. I appreciate your offer to provide information about the Columbus Coated Fabrics draft permit to citizens residing in the area.

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Michael Ohm Environmental Protection Assistant

Enclosures

5 HW: WMB: RAIU: M. OHM: M. OHM: 6/29/84

Initials	Typist	Author MAO	Other Staff	RAIU	SPIS Secy.	SPIS Chief	WMB Chief	WM9 Director
Date	WKO 6/29/84	6/29/84		1 /a/51				

Carl Wendelken
Public Service Announcements
WMNI-AM
310 South High Street
Columbus, Ohio 43215

Dear Mr. Wendelkin:

Per our telephone conversation on June 28, 1984, I am enclosing a Public Service Announcement regarding a hazardous waste permit that the United States Environmental Protection Agency (U.S. EPA), Region V, is considering issuing to Columbus Coated Fabrics, Columbus, Ohio. I appreciate your offer to provide information about the Columbus Coated Fabrics draft permit to citizens residing in the area.

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Sincerely,

Michael Ohm Environmental Protection Assistant

Enclosures

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EPA Form 1900-8 (Rev. 10-82) 7-80 and 12-80 editions may be used; all others are obsolete.

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US ENVIRONMENTAL PROTECTION

230 S. DEARBORN ST CHICAGO ILL

Form 005(7-82)

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RADIOHIO, INC. REMIT TO:

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REPRESENTATIVE SALESMAN
RANDI WEISSPELD

ADVERTISER PRODUCT
US ENVIRONMENTAL US ENVIRONMENTAL

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ORDER FOR SUPPLIES OR SERVICES

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EPA Form 1900-8 (Rev. 10-82) 7-80 and 12-80 editions may be used; all others are obsolete.

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September 1973 4 Treasury FRM 2000

CONTACT: m1CHAEL OHM (312) 886-1657 Standard Form No. 1143

ADVERTISING ORDER

50259NALX ORDER NUMBER

DEPARTMENT OR ESTABLISHMENT, BUREAU OR OFFICE

U.S. Environmental Protection Agency, Waste Management Branch

DATE 5 / 30/84

The publisher of the publication named below is authorized to publish the enclosed advertisement according to the schedule below provided the rates are not in excess of the commercial rates charged to private individuals with the usual discounts. It is to be set solid, without paragraphing, and without any display in the heading unless otherwise expressly authorized in the specifications.

NAME OF THE PUBLICATION ADVERTISED IN Dispatch SUBJECT OF ADVERTISEMENT EDITION OF PAPER ADVERTISEMENT APPEARED Public Notice Evening NUMBER OF TIMES ADVERTISEMENT APPEARED DATE(s) ADVERTISEMENT APPEARED One Time Only Wednesday, June 20, 1984 SPECIFICATIONS FOR ADVERTISEMENT

Place in legal notice/classified section

COPY FOR ADVERTISEMENT

See attached

	AUTHORITY TO ADVERTISE		INSTRUMENT OF ASSIGNMENT
NUMBER	50259NALX	NUMBER	
DATE	June 13, 1984	DATE	
SIGNATURE O	FAUTHORIZING OFFICIAL MANSPE	TITLE	
~	INSTRUCTIONS	TO PHRICHED	2

Extreme care should be exercised to insure that the specifications for advertising to be set other than solid be definite, clear, and specific since no allowance will be made for paragraphing or for display or leaded or prominent headings, unless specifically ordered, or for additional space required by the use of type other than that specified. Specifications for advertising other than solid and the advertisement copy submitted to the publisher will be attached to the voucher. The following is a sample of solid line advertisement set up in accordance with the usual Government requirements.

> DEPARTMENT OF HIGHWAYS & TRAFFIC, D.C. Bids are requested for first spring 1966 cement concrete repair contract, including incidental work, Washington, D.C., Invitation No. C-5576-H, consisting of 11,000 ac, yds. PCC Class BB sidewalk repair and 2,000 cu. yds. PCC Class A pavement, alley, & driveway repair, both cut repairs only. Bidding material available from the Procurement Officer, D.C. Scaled bids to be opened in the Procurement Officer at 8:00 p.m., Novamber 15, 1985. November 15, 1965.

Your bill for this advertising order should be submitted on the "Public Voucher for Advertising" form, which is printed on the reverse of this form, immediately after the last publication of the advertisement. If copies of the printed advertisement are not available, complete the affidavit provided on the voucher. Submit the voucher and a copy of the printed advertisement to U.S. EPA

Financial Operations Section 230 South Dearborn

Chicago, Illinois 60604

IMPORTANT

Charges for advertising when a cut, matrix, stereotype or electrotype is furnished will be based on actual space used and no allowance will be made for shrinkage.

In no case shall the advertisement extend beyond the date and edition stated in this order.

?

P.O. Box 1049, 1800 WaterMark Dr. lumbus, Ohio 43266-0149 4) 644-3020 AX (614) 644-2329

George V. Voinovich
Governor

July 12, 1991

Re: Columbus Coated Fabrics

U.S. EPA ID No.: OHD004294351

Ohio ID No.: 01-25-0145

Closure Plan

Columbus Coated Fabrics
Attn: Mr. Grover B. Thomas
PO Box 208
Columbus, Ohio 43216

Dear Mr. Thomas:

A public notice acknowledging the Ohio EPA's receipt of a closure plan for Columbus Coated Fabrics located at 1280 N. Grant Ave., Columbus, Ohio 43201 will appear the week of July 15, 1991 in the Columbus Dispatch, Columbus, Ohio. The Director of the Ohio EPA will act upon the closure plan request following the close of the public comment period, August 21, 1991.

Copies of the plan will be available for public review at the Columbus Metropolitan Library, 96 S. Grant Ave., Columbus, Ohio 43215 and the Ohio EPA, Central District Office, 2305 Westbrooke Dr., Bldg. C, Columbus, Ohio 43228.

Please contact Randy Sheldon at (614) 644-2977, if you have any questions concerning this matter.

Very truly yours,

Thomas E. Crepeau, Manager

Data Management Section

Division of Solid and Hazardous Waste Management

TC/rs/closurereceipt

cc: Lisa Pierard, U.S. EPA, Region V Randy Meyer, Ohio EPA, DSHWM, RCRA TAS Andrew Kubalak, Ohio EPA, DSHWM, CDO

RECEIPT OF HAZARDOUS WASTE CLOSURE PLAN

For: Columbus Coated Fabrics, 1280 N. Grant Ave., Columbus, Ohio 43201, EPA ID No.: OHD004294351, Ohio ID No.: 01-25-0145. Pursuant to OAC Rule 3745-66-10 thru 17 and 40 CFR, Subpart G, 265.110 thru 117, the Ohio Environmental Protection Agency (Ohio EPA) is hereby giving notice of the receipt of a Hazardous Waste Facility Closure Plan for the Hazardous Waste Drum Storage Area for the above referenced facility. Ohio EPA is also giving notice that this facility is subject to a determination concerning corrective action, a requirement under the Hazardous and Solid Waste Amendments of 1984, which concerns any possible uncorrected releases of hazardous waste or hazardous constituents to the environment from any current or previous solid waste management units at the above facility. A corrective action determination is required from hazardous waste facilities intending to close.

Copies of the facility's Closure Plan will be available for public review at the Columbus Metropolitan Library, 96 S. Grant Ave., Columbus, Ohio 43215 and the Ohio EPA, Central District Office, 2305 Westbrooke Dr., Bldg. C, Columbus, Ohio 43228. Comments concerning this plan or factual information concerning any releases of hazardous waste or hazardous waste constituents by the above facility requiring corrective action should be submitted within 30 days of this notice to: Ohio Environmental Protection Agency, Div. of Solid & Hazardous Waste Mgmt., Data Management Section, Attn: Thomas E. Crepeau, Box 1049, Columbus, Ohio 43266-0149.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION V

DATE: July 27, 1984

Significant Action - Public Hearing on the Intent to Issue a RCRA Permit SUBJECT:

FROM: Michael Ohm, EPA

Regulatory Analysis and Information Unit

Karl J. Klepitsch, Jr., Chief

Waste Management Branch

Facility: Columbus Coated Fabrics

Division of Borden, Inc. 1280 North Grant Street

Columbus, Ohio

Type of Facility: Storage Facility

Public Notice Date: June 20, 1984

Public Hearing Date and Time: July 25, 1984

7:00 to 10:00 p.m.

Hearing Location: Columbus Public Library

Auditorium

96 South Grant Street

Columbus, Ohio

Permit Writer: Charles Slaustas

Hearing Officer: April Katsura

Hearing Assistant: Arthur Kawatchi

Public Notice Contact: Michael Ohm

End of Comment Period: August 27, 1984

Narrative: Please see the attached

C. Christenson Acting RAIU Chief

File Copy 041-54

UNITED STATES OF AMERICA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

PUBLIC HEARING

IN RE: ISSUANCE OF RCRA PERMIT TO COLUMBUS COATED FABRIC

DATE: 7/25/84

PLACE: Columbus Public Library Auditorium

97 South Grant

Columbus, Ohio

TIME: 7:00 p.m.

APPEARANCES:

On Behalf of U.S.E.P.A. April Katsura

Charles Slaustas

* * * * * *

CARLIN ASSOCIATES
SUITE 426
12900 LAKE AVENUE
CLEVELAND, OHIO 44107

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5	NAME	PAGE
6	APRIL KATSURA	
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9	CHARLES SLAUSTAS	4
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11	MICHAEL POMPILI	14
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MS. KATSURA: Will the hearing please come to order.

Good evening ladies and gentlemen.

My name is April Katsura, and I am the

Hearing Officer representing the Chicago

Office of the United States Environmental

Protection Agency.

The purpose of tonight's hearing is to receive your comments into the record of U.S. EPA's intent to issue a Resource Conservation and Recovery Act Permit to Columbus Coated Fabric, a division of Borden Incorporated, to operate a hazardous waste storage facility at 1280 North Grant Street, Columbus, Ohio.

With me on the panel is Charles
Slaustas, the primary author of U.S.
EPA's draft permit. Our hearing assistant
at the registration table is Arthur
Kawatachi.

Under the Resource Conservation and Recovery Act, commonly referred to as RCRA, U.S. EPA has promulgated regulations to protect human health and the

environment from the improper management of hazardous waste.

Section 3005 of RCRA, along with regulations found in Title 40 of the Code of Federal Regulations, establish a permitting system governing the treatment, storage, and disposal of hazardous waste. These regulations enable U.S. EPA to issue or deny permits for hazardous waste facilities.

If a state is authorized, under
Section 3006 of RCRA, it may issue or
deny permits in lieu of U.S. EPA. Since
the State of Ohio has not yet received
the required authorization, U.S. EPA is
responsible for making a final determination on the Columbus Coated Fabric
permit application. Additionally, Columbus Coated Fabric must meet all state
requirements as well.

If U.S. EPA issues a permit to

Columbus Coated Fabric, the company must

comply with all of the conditions contained in the permit.

These conditions, in turn, must

satisfy the requirements found in Title 40 of the Code of Federal Regulations. The requirements include: The proper design, operation, and maintenance of Columbus Coated Fabrics' storage facility; accident preventions and preparedness; closure; and financial responsibility, among others.

Before accepting comments from the audience, Mr. Slaustas will present the background on Columbus Coated Fabric's permit application and U.S. EPA's draft permit. Following that, I will give you a summary of U.S. EPA's public participation activities and requirements, and we will then accept comments from the audience.

Mr. Slaustas?

MR. SLAUSTAS: Columbus Coated

Fabrics presently owns and operates a

plant which manufactures decorative vinyl

products. Hazardous wastes are generated

from the manufacturing process as well

as from a solvent recycling operation.

The hazardous wastes which are

generated and stored temporarily at

Columbus Coated Fabrics include spent

halogenated solvents, spent nonhalogenated solvents, and still bottoms

from the recovery of spent non-halogenated

solvents. These wastes are considered
hazardous due to ignitability or toxicity.

The hazardous waste storage facility

The hazardous waste storage facility at Columbus Coated Fabrics has a maximum capacity of 24,750 gallons in containers. The drums containing hazardous wastes are stored indoors on impervious concrete and the storage facility is designed to contain any inadvertent spill or leak.

Columbus Coated Fabrics filed a

Part B permit application for this

facility on September 30, 1982. After

performing a completeness check, both

U.S. EPA and Ohio EPA conducted a review

for technical adequacy.

As a result of these reviews,

Columbus Coated Fabrics provided

additional information regarding their

application. After completing the review

for technical adequacy, Ohio EPA and U.S.

EPA jointly prepared a draft permit

based on federal standards applicable

to all hazardous waste facilities, as

well as standards applicable for container

storage.

The permit conditions are based

The permit conditions are based on various requirements published in federal regulations pertaining to facilities which store hazardous wastes. The permit conditions encompass such items as waste analysis, personnel training, contingency plan, inspection requirements, and closure.

In addition to this proposed hazardous waste permit, Columbus Coated Fabrics has received a Hazardous Waste Facility Installation and Operation Permit from the State of Ohio.

Thank you.

MS. KATSURA: U.S. EPA fully supports RCRA's mandate to encourage public participation.

To briefly summarize U.S. EPA's public participation procedures, RCRA requires the Agency to notice its intent

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to issue or deny a permit in a major local newspaper, to broadcast it over a local radio station, and to provide opportunity for a public hearing. On June 20, 1984, U.S. EPA published a public notice in the Columbus Dispatch.

The notice announced this public hearing and also announced the availability for public inspection of the Agency's administrative record on Columbus Coated Fabric's permit application and the availability of the draft permit.

Radio Stations WFRD-AM and WBNS-AM broadcasted notices of this hearing on June 20, 1984.

The administrative record is available at U.S. EPA's Office in Chicago.

This record includes: The permit application submitted by Columbus Coated Fabric, U.S. EPA's draft permit, our fact sheet, and other related background documents.

In addition, the application, the draft permit, and the fact sheet have

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been made available at the Columbus
Public Library, at 97 South Grant in
Columbus.

All comments received tonight, whether written or oral, will become part of the administrative record.

The Code of Federal Regulations
requires that the public notice allow
for a 45-day public comment period. The
June 20th public notice and radio announcement stated that the public comment
period for this permit would end on
August 1, 1984. This date was calculated
in error. The correct date should have
been August 6, 1984.

Therefore, the Agency is hereby announcing that the public comment period for the Agency's intent to issue an RCRA permit to Columbus Coated Fabric, has been extended to August 6, 1984. Written comments postmarked by August 6th will become part of the administrative record.

After the close of the public comment period on August 6th, U.S. EPA will evaluate all information received,

prior to reaching a final permit decision on the application.

When making its final decision,

U.S. EPA will respond to all relevant

comments which have been received during

the public comment period, including

those comments presented tonight.

If new information or evidence is submitted to U.S. EPA, and the information raises substantial new questions concerning the draft permit, U.S. EPA may prepare a new draft permit or a revised fact sheet.

If there is a need for substantial revision of the original draft permit or the Agency's preliminary permit conditions, the comment period may be extended or reopened. And, U.S. EPA will publish notice of this fact in the Columbus Dispatch.

If the comment period is reopened or extended, U.S. EPA will consider only those comments which pertain to the issues raised by the new information or evidence.

Along with the final permit decision,

U.S. EPA will issue a responsiveness

summary, which will contain U.S. EPA's

response to the relevant comments which

have been raised.

The summary will also indicate
which conditions, if any, of the draft
permit were changed. U.S. EPA will also
indicate if any additional documents
have been included in the administrative
record. Both U.S. EPA's final permit
decision and responsiveness summary will
be included in the administrative record.

Notification of our final permit

decision will be provided to Columbus

Coated Fabric and to each individual who

has either: presented oral comments at

this hearing; submitted written comments;

or requested notice of our decision.

If you filed comments on this
draft permit, or participated in this
public hearing by presenting comments,
you may request U.S. EPA Administrator,
William Ruckelshaus, to review and
reconsider the final permit decision.

Persons who did not file comments orally at this hearing, or in writing during the public comment period, may request review only of the changes, if any, U.S. EPA made from the draft permit to the final permit.

All requests for review must be made within 30 days after the final permit decision has been issued and must be addressed to Administrator Ruckelshaus in Washington.

The specific procedures which you must follow in order to request review will be included in U.S. EPA's final permit decision. Copies of the appeal procedures are also available at the registration table.

For anyone present who does not plan to submit oral or written comments, but would like to receive notice of U.S. EPA's final permit decision and response to comments, there is a sign-up sheet at the registration table.

U.S. EPA will have a transcript made of tonight's hearing. If you

would like a copy of the transcript,
please sign the sheet at the registration
table. If the transcript is 50 pages
or more, there will be a copying charge.

If you have not filled out a sign-in card, we would appreciate your doing so before you leave tonight. The sign-in cards are also at the registration table. I recommend that you state for the record any comments or questions that you have.

I would like to stress at this
point that the purpose of tonight's
hearing is to collect your comments and
questions. The Agency's official
response or answers to your questions
will not be presented this evening. But,
the Agency will present its official
response in the Responsiveness Summary.

I would like to repeat that the Agency will send you, free of charge, a copy of the Responsiveness Summary if you sign your name and address on the sheet at the registration table.

Mr. Slaustas and I will be available

during the break and after I adjourn this hearing. We will, at that time, attempt to provide you with any information that we can.

All persons wishing to speak tonight should register their intent on the sign-in cards. If you decide you want to present comments, and have not yet indicated your intent, please fill out a card and hand it to the hearing assistant. I will call the speakers in the order in which the requests to speak were received.

As your name is called, please
step to the podium. Before you begin
to speak, please give your name and spell
your last name for the Court Reporter.
Your comments, in written form, should
be given to the Court Reporter before
you begin your presentation.

Please limit your presentation to ten minutes. At the end of your presentation, Mr. Slaustas or I may ask you to clarify some of your comments.

If you have any questions on U.S.

EPA's procedures, or on the draft permit,
Mr. Slaustas and I will be available
at the break immediately following the
hearing.

We will now begin to receive your comments. Please remember to repeat your name and spell it for the Reporter.

At this time we have one request to speak, Mr. Michael J. Pompili.

MR. POMPILI: My name is Michael J. Pompili, P-o-m-p-i-l-i.

In October of 1982, Columbus

Coated Fabrics made application to the

United States Environmental Protection

Agency to establish a hazardous waste

storage facility for still bottom waste,

dust stop oil, plasticizer residue, and

plating pit sludge at its 1280 North

Grant Avenue business in Columbus.

The U.S. EPA has reviewed this application and determined that it appears to comply with U.S. EPA rules and the application appears to meet the performance standards set forth in Title 40, Part 264. Columbus Coated

ed by the Environmental Health Division of the Columbus Health Department and other appropriate agencies. In our review we have developed some concerns regarding the protection of the health, safety, and well-being of the surrounding community.

Although we are aware of the large quantities of hazardous materials stored at this facility current federal and state laws and this application deals only with hazardous wastes. Therefore our comments are directed solely toward the storage of hazardous waste at this site.

Our review of this application has highlighted several deficiencies which we feel must be addressed before a final permit is granted.

First, Part 264.37 states that

"the owner or operator must attempt to

make the following arrangements..(1)

arrangements to familiarize police, fire

departments, and emergency response teams

with the layout of the facility, properties of hazardous wastes handled at the facility and associated hazards... and (2) arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or ilness which could result from fires, explosions, or releases at the facility".

Although letters of transmittals along with the pertinent sections of the application have been submitted to the above mentioned agencies, to our knowledge no formal arrangements have been agreed upon by these agencies and the applicant as required by Part 264.52.

Secondly, the Division of Sewers
and Drains from Columbus have expressed
concerns about the containment procedures
in the event of a spill outside the
hazardous waste storage building. Among
the questions raised are the following:

(1) Is the amount of stored emergency material for such spills adequate for containment, (2) can the

manhole in the street where such spills would be contained be sealed to prevent entry into the city's sewer system, and (3) are there other options available for spill containment?

Although the applicant states that evacuation of nearby residents is not needed in the event of an emergency at this facility, this department believes that such is not the case.

Residential property is within

1,000 feet of the site and evacuation

procedures might need to be initiated

in the event of a fire or an explosion.

In addition, three schools are within one kilometer of the plant, their evacuation would be difficult under emergency conditions due to dependence upon public transportation.

Lastly, Part 264.16(d) requires"a written description of the type and amount of both introductory and continuing training that will be given to each person filling a hazardous waste management position". This information is

lacking in the application.

I would like to address our recommendations at this time. First, the Columbus Health Department desires that an inspection of the site is performed on a quarterly basis. Such a program, whether performed by the Columbus Fire Department, which has agreed to perform this inspection, the U.S. EPA, or our department, would help to insure that incompatible wastes would not be stored in close proximity to each other and that the stored containers would be in good condition.

Secondly, we recommend that a health assessment survey of the surrounding community be conducted in the event of a fire or an explosion. The extent of any acute exposure from such an incident could then be determined.

In addition, we recommend environmental monitoring to be performed if a
fire or spill does occur. The monitoring
might include sampling the air, soil, or
water surrounding the site depending on

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the type and seriousness of the fire or spill.

To prevent the contamination of both ground water and public water supplies by the storage of hazardous waste at Columbus Coated Fabrics, we recommend that the Columbus Division of Water in cooperation with Columbus Coated Fabrics conduct a cross connection survey for the facility.

We also request that the previously mentioned application deficiences be corrected or addressed before a final permit is issued. Specifically, we recommend that (1) the contingency plan include the arrangements agreed to by local police departments, fire departments, and hospitals as required in Part 264.52, (2) the Division of Sewers and Drains be contacted to discuss other options other than hie storm sewer system for spills, (3) Columbus Coated Fabrics acknowledge possible need for evacuation plan for residents, and (4) the application contain a written description of the

type and amount of training given to each hazardous waste management personnel as required in Part 264.16.

The Columbus Health Department
also recommends that Columbus Coated
Fabrics notifies the Division of Fire
in the event of a spill of 25 gallons or
more of a flammable hazardous waste so
as to reduce response time to any
emergency.

Finally, we request that an extension of time be granted for the written comment period as cited in Part 124.12 of Title 40. This extension is needed to perform a thorough review of the application since a copy of the application was not received by our office until July 9, 1984.

In conclusion, the Columbus Health
Department believes that an inspection
program coupled with detailed contingency
plans will help to minimize any adverse
impact to the surrounding community.

We also request that the above conditions be incorporated within a

1	Memorandum of Understanding between the
2	City of Columbus and the applicant.
3	However, if the U.S. EPA does not place
4	these conditions on the permit, then we
5	will oppose the permit and request that
6	it be denied.
7	We are willing to sit down and
8	discuss our recommendations with U.S.
9	EPA and Columbus Coated Fabrics'
10	representatives at any time and, thank you
11	for your time.
12	MS. KATSURA: Is there anyone
13	present who has requested to speak or
14	whose name has not been called?
15	Is there anyone who would like to
16	make a comment?
17	It is now 7:30 p.m. We will take
18	a break. The hearing will remain open
19	until 7:45 p.m. If anyone else arrives
20	by that time, they will have an oppor-
21	tunity to make a comment for the record.
22	We will now recess.
23	(Whereupon, a 20-minute recess
24	was held.)
25	MS. KATSURA: It is now 7:50 p.m.

1		The hearing will reconvene.
2		As a result of Mr. Michael J.
3		Pompili's request tonight for an
4		extension of the public comment period,
5		as well as our understanding that the
6	2	Columbus Public Library did not acknowledge
7		receipt of the Columbus Coated Fabrics'
8	2	permit application and related documents
9	¥	until July 13th, 1984, we are granting
10		an extension of the public comment period
11		to allow all interested parties at least
12		45 days to review the permit document.
13		The Agency is hereby announcing
14	5	the public comment period for the
15		Agency contends to issue a record permit
16		to Columbus Coated Fabrics has been
17		extended to August 27th, 1984. Written
18	*	comments postmarked by August 27th will
19		become part of the administrative Record.
20		Is there anyone who would like
21		to make a comment?
22		Thank you very much for your

Thank you very much for your participation in tonight's hearing. The hearing is adjourned.

(Whereupon, the hearing was adjourned.)

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CERTIFICATE

This is to certify that the foregoing proceedings were recorded by PHENON WILKES, Court Reporter, and that the same is a true and accurate transcript thereof.

Phenon Wilkes, Notary Public in and for the State of Ohio.

My Commission Expires: May 16, 1988

MR. KAWATACHI: Will the hearing please come to order.

Good evening ladies and gentlemen.

My name is Art Kawatachi, and I am the

Hearing Officer representing the Chicago

office of the United States Environmental

Protection Agency.

The purpose of tonight's hearing is to receive your comments into the record of U.S. EPA's intent to issue a Resource Conservation and Recovery Act permit to Columbus Steel Drum to operate a hazardous waste storage facility at 1385 Blatt Boulevard, Blacklick, Ohio.

With me on the panel is James Mayka, the primary author of U.S. EPA's draft permit. Our hearing assistant at the registration table is April Katsura.

Under the Resource Conservation
and Recovery Act, commonly referred to
as RCRA, U.S. EPA has promulgated regulations to protect human health and the
environment from the improper management
of hazardous waste.

Section 3005 of RCRA, along with

regulations found in Title 40 of the

Code of Federal Regulations, establish
a permitting system governing the treatment, storage, and disposal of hazardous
waste. These regulations enable U.S.

EPA to issue or deny permits for hazardous
waste facilities.

If a state is authorized, under
Section 3006 of RCRA, it may issue or
deny permits in lieu of U.S. EPA. Since
the State of Ohio has not yet received
the required authorization, U.S. EPA is
responsible for making a final determination on the Columbus Steel Drum's permit
application. Additionally, Columbus Steel
Drum must meet all state requirements
as well.

If U.S. EPA issues a permit to

Columbus Steel Drum, the company must

comply with all of the conditions contained in the permit. These conditions, in

turn, must satisfy the requirements found
in Title 40 of the Code of Federal

Regulations. These requirements include:

The proper design, operation, and

maintenance of Columbus Steel Drum's storage facility; accident preventions and preparedness; closure; and financial responsibility, among others.

Before accepting comments from the audience, Mr. Mayka will present the background on Columbus Steel Drum's permit application and U.S. EPA's draft permit.

Following that, I will give you a summary of U.S. EPA's public participation activities and requirements, and we will then accept comments from the audience

MR. MAYKA: The Columbus

Steel Drum Company is located on 1385

Blatt Boulevard, Blacklick, Ohio. The company is primarily a reconditioner of used steel drums but operates as an extension of its business a small hazardous waste storage facility.

The hazardous waste that is stored originates from one of the following:

1) Residues found at the bottom of some incoming drums. 2) Caustic washes

used to clean out the drums. 3) Oxidation products used for burning the interiors of drums. 4) Floor sweepings from processed areas of the plants.

Hazardous waste storage, that is the subject of this draft permit, occurs only in closed drums in a specially designated drum storage area and in one underground storage tank.

The waste involved and considered hazardous under Federal law because it is ignitable, a regulatory term roughly meaning very flammable, or because they contain certain amounts of lead and/or Cadmium.

Lead and Cadmium are elements

found in some of the paints and paint
residue associated with the incoming

barrels. These elements can be toxic

if ingested at sufficiently high concentration.

The drum storage area is roughly
a 40 foot by 20 foot outdoor concrete
pad and the draft permit would allow
no more than 100 55-gallon drums to be

stored there at any one time.

and posted and is surrounded by an eight inch high concrete curbing on all sides. The concrete pad is also banked so that any spills, leaks or accumulated precipitation will flow to one end where a collection basin is located.

The concrete strength is 400 pounds per square inch and the pad is reinforced with six inch by six inch by 9 gauge wire mesh and the curbing is reinforced with a half inch steel reinforcing rod.

The underground storage tank has the capacity of 6,000 gallons. The tank is constructed of one quarter inch thick steel and is set in sand strapped to a concrete pad.

The tank was constructed through Underwriters Laboartory specifications and the permit would require that the tank's thickness be maintained at the one quarter inch thickness.

No materials which could be corrosive to the steel are stored in

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inspection purposes is via a manhole
type cover located above grade on top
of the tank and includes a built-in
access ladder.

Overflowing of the tank is prevented by means of a automatic overflow switch activated by slopes located in the tank.

The tank construction and operation meets all applicable National Fire Protection Association standards. Columbus Steel Drum filed its Federal permit application in May of 1983. After a formal review that showed the application was complete that it addressed all items required by regulations both the Ohio Invironmental Protection Agency and the United States Environmental Protection Agency undertook a technical adequacy review to insure that the facility will be able to comply with all of the technical permitting standards required by Federal law.

The company satisfied both

agencies that the standards would be met.

The draft permit, if issued,
incorporates all of the applicable
Federal standards. Actual portions of
Columbus Steel Drum's permit application
are also incorporated in this permit.
These include a waste analysis plan, an
inspection schedule, a training program,
a contingency plan, and certain operating
procedures for the underground tank.

This permit, if issued, would allow the company to store hazardous waste only in drums and in one tank.

No burial or disposal of hazardous waste, in any manner, occurs now or can occur on this site.

Thank you.

MR. KAWATACHI: U.S. EPA fully supports RCRA's mandate to encourage public participation. To briefly summarize our public participation procedures, RCRA requires the agency to notice its intent to issue or deny a permit in a major local newspaper, to broadcast it over a local radio station,

and to provide opportunity for a public hearing.

on June 25, 1984, U.S. EPA published in the Columbus Dispatch the notice of this public hearing. It also announced the availability for public inspection of the Agency's administrative record on Columbus Steel Drum's permit application and our draft permit. Radio Stations

WRFD - AM and WBNS - AM broadcasted notice of this hearing of June 25th.

The administrative record is available at U.S. EPA's office in Chicago. This record includes: The permit application submitted by Columbus Steel Drum, U.S. EPA's draft permit, statement of basis, and other related background documents.

In addition, the application, the draft permit, and statement of basis have been made available at this Columbus Public Library, and at the Reynoldsburg Branch Library, 1402 Brice Road, Reynoldsburg, Ohio.

All comments received tonight,

whether written or oral, will become part of the administrative record.

Ment period on August 10th, U.S. EPA
will evaluate all information received,
prior to reaching a final permit decision
on the application. When making its
final decision, U.S. EPA will respond
to all relevant comments which have been
received during the public comment period,
including those comments presented
tonight.

If new information or evidence is submitted to U.S. EPA, and the information raises substantial new questions concerning the draft permit, U.S. EPA may prepare a rew draft permit or a revised statement of basis.

If there is a need for substantial revision of the original draft permit or the Agency's preliminary permit conditions, the comment period may be extended or reopened, and U.S. EPA will publish notice of this fact in the Columbus Dispatch.

If the comment period is reopened or extended, U.S. EPA will consider only those comments which pertain to the issues raised by the new information or evidence.

Along with the final permit

decision, U.S. EPA will issue a responsiveness summary, which will contain our
response to the relevant comments which
have been raised.

which conditions, if any, of the draft permit were changed. U.S. EPA will also indicate if any additional documents have been included in the administrative record. Both U.S. EPA's final permit decision and responsiveness summary will be included in the administrative record.

Notification of our final permit

decision will be provided to Columbus

Steel Drum and to each individual who

has either: presented oral comments at

this hearing; submitted written comments;

or requested notice of our decision.

If you made comments on this draft permit, or participated in this public

hearing by presenting comments, you may request U.S. EPA Administrator, William Ruckelshaus, to review and reconsider the final permit decision.

Persons who did not file comments orally at this hearing, or in writing during the public commen period, may request review only of the changes U.S. EPA made, if any, from the draft permit to the final permit.

All requests for review must be made within 30 days after the final permit decision has been issued and must be addressed to Administrator Ruckelshaus in Washington.

The specific procedures which you must follow in order to request review will be included in our final permit decision.

copies of the appeal procedures are also available at the registration table. For anyone present who does not plan to submit oral or written comments, but would like to receive notice of our final permit decision and response to

comments, there is a sign-up sheet at the registration table.

U.S. EPA will have a transcript
made of tonight's hearing. If you would
like a copy of the transcript, please
sign the sheet at the registration table.
If the transcript is 50 pages or more,
there will be a copying charge.

If you have not filled out a sign-in card, we would appreciate your doing so before you leave tonight. The sign-in cards are also at the registration table.

I should like to stress at this
point that the purpose of tonight's
hearing is to receive your comments into
the record. U.S. EPA will present its
official response in the responsiveness
summary. We will be available after this
hearing to provide you with any information available.

All persons wishing to speak tonight should register their intent on the sign-in cards. If you decide you want to present comments, and have not yet indicated your intent, please fill out

1	2	a card and hand it to the hearing
2		assistant. I will call the speakers in
3		the order in which the requests to speak
4		were received.
5		As your name is called, please
6		step to the podium. Before you begin
7		to speak, please give your name and
8	17 B 1 - 12	spell your last name for the Court
9		Reporter.
10		Your comments, in written form,
11		should be given to the Court Reporter
12		before you begin your presentation.
13		Please limit your presentation
14		to ten minutes. At the end of your
15		presentation, we may ask you to clarify
16	Li jed	some of your comments.
17		You may submit longer comments in
18		writing tonight or anytime before the
19	<u> </u>	close of the public comment period on
20		August 10, 1984.
21		If you have any questions on U.S.
22		EPA's procedures, or on the draft permit
23		we will be available immediately follow-
24		ing the hearing.

We will now begin to receive your

1	comments. Please remember to repeat
2	your name and spell it for the Reporter.
3	Is there anyone who would like to
4	make a comment?
5	It is now 7:20 p.m. We will take a
6	break. The hearing will remain open until
7	7:50 p.m. If anyone else arrives by that
8	time, they will have an opportunity to
9	make a comment for the record.
10	We will now recess. In the meantime,
11	we will take some questions and answers
12	from the audience, if there are any.
13	It is now 7:50 p.m.
14	The hearing will reconvene.
15	Is there anyone who would like to
16	make a comment?
17	These will be off the record.
18	(Whereupon, a 30-minute recess was
19	taken and questions were answered.)
20	Thank you very
21	much for your participation in tonight's
22	hearing. The hearing is adjourned.
23	(Whereupon, the hearing was
24	adjourned.)
25	

CERTIFICATE

This is to certify that the foregoing proceedings were recorded by PHENON WILKES, Court Reporter, and that the same is a true and accurate transcript thereof.

Phenon Wilkes, Notary Public in and for the State of Ohio.

My Commission Expires: May 16, 1988



City of Columbus Mayor Dana G. Rinehart

Columbus Health Department

William C. Myers, M.S., Health Commissioner

The Ollie M. Goodloe Health Center 181 Washington Boulevard Columbus, Ohio 43215-4096

June 22, 1984

Michael Ohm U.S. EPA Region V Waste Management Branch 230 South Dearborn Street Chicago, Illinois 60604

Dear Mr. Ohm:

This letter is in response to the public notice concerning the U.S. EPA's intent to issue a RCRA permit for Columbus Coated Fabrics in Columbus, Ohio. It is our intention to testify at the public hearing and to provide written comment on the application before the issuance of a final permit decision. To that end, the City of Columbus is requesting the following:

- (1) an extension of time for the public hearing so that a coalition of city agencies and other interested parties can adequately review the application; and
- (2) a copy of the application, the U.S. EPA's draft permit, and the Statement of Basis.

I believe these requests are vital to the health, safety, and well-being of the residents surrounding this facility.

Since the Columbus Health Department has been designated as the lead agency for local hazardous materials involvement, please direct all future correspondence regarding this application and other hazardous waste permits to the staff person listed below:

> Gary Brown Columbus Health Department Environmental Health Division 181 S. Washington Blvd. Columbus, Ohio 43215

> > Sincerely,

William C. Myers, M.S.

Health Commissioner

Board of Health

Mayor Dana G. Rinehart. President Ex-Officio Marvin G. Green, M.D., President Pro-Tempore William C. Myers, M.S., Secretary

Joseph S. Backiewicz, D.D.S. Nancy A. Brunner, R.N., M.S. George L. Eckert, Jr., D.O. Jack W. Miles, M.D.



COLUMBUS COATED FABRICS DRAFT PERMIT RADIO BROADCAST ANNOUNCEMENT

The United States Environmental Protection Agency Region V (five) intends to issue a permit to Columbus Coated Fabrics (CCF), to operate its hazardous waste storage facility at 1280 North Grant Street, Columbus, Ohio.

U.S. EPA is seeking public comments before a final decision is made to issue the permit. Written comments on the draft permit will be received by U.S. EPA and must be postmarked no later than August 1, 1984.

A public hearing on the CCF draft permit was requested and will be held on Wednesday, July 25, 1984, at the Columbus Public Library Auditorium, 97 South Grant Street, Columbus, Ohio, from 7:00 p.m. to 10:00 p.m.

For more information, citizens should contact Waste Management branch at (312) 886-1657.

Enclosed is a copy of the Public Notice that will appear on June 20, 1984, in the Columbus <u>Dispatch</u>. The United States Environmental Protection Agency (U.S. EPA) is announcing the availability for public review of a draft Resource Conservation and Recovery Act (RCRA) permit for Columbus Coated Fabrics (CFF), to operate a hazardous waste storage facility in Columbus, Ohio. U.S. EPA is inviting public comments on the draft permit, which specifies conditions under which CCF must manage hazardous wastes in order to comply with Federal regulations.

A public hearing has been scheduled for July 25, 1984, at the Columbus Main Library, Auditorium, 97 South Grant Avenue, Columbus, Ohio. The hearing will begin at 7:00 p.m., and will continue until all persons, who have registered, have had an opportunity to present their comments for the record.

Enclosed for your information is a copy of the Statement of Basis and pertinent public participation procedures. Please contact Mr. Mike Ohm, of my staff, at (312) 886-1657, for copies of U.S. EPA's draft permit for CCF.

Before taking final action on the permit, U.S. EPA Region V will give full consideration to all public comments that are relevant to the terms and conditions of the permit. These terms and conditions are based on Federal permitting regulations, as outlined in Title 40 of the Code of Federal Regulations, Part 270.

Please contact Mr. Ohm, if you have any questions, or desire additional information.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief

Waste Management Branch

Enclosures

PUBLIC SERVICE ANNOUNCEMENT

THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION FIVE IS HOLDING A PUBLIC HEARING ON THE ISSUANCE OF A RESOURCE CONSERVATION AND RECOVERY ACT PERMIT TO ALLOW COLUMBUS COATED FABRICS, A DIVISION OF BORDEN, INC., TO STORE HAZARDOUS WASTE AT 1280 NORTH GRANT STREET, COLUMBUS, OHIO. THE PERMIT WOULD ALLOW COLUMBUS COATED FABRICS TO STORE VARIOUS HALOGENATED (METHYLENE CHLORIDE) AND NON-HALOGENATED SOLVENTS (CYCLOHEXANONE), AS WELL AS ELECTROPLATING SLUDGE. THESE WASTES ARE LISTED AS HAZARDOUS DUE TO THE CHARACTERISTICS OF IGNIBILITY AND/OR TOXICITY.

THE HEARING WILL BE HELD ON JULY 25, 1984, AT 7:00 P.M. AT THE COLUMBUS PUBLIC LIBRARY, AUDITORIUM, 96 SOUTH GRANT STREET, COLUMBUS, OHIO.

PUBLIC NOTICE

The United States Environmental Protection Agency (U.S. EPA), Region V, is hereby giving notice of its intent to issue a Resource Conservation and Recovery Act (RCRA) permit for Columbus Coated Fabrics (CCF), in accordance with Section 7004 of the RCRA and Title 40 CFR 124.10. This permit would allow CCF to operate a hazardous waste storage facility at 1280 North Grant Street, Columbus, Ohio. U.S. EPA is inviting public comments, and will hold a public hearing on this application.

CCF is primarily a manufacturer of decorative vinyl products. Hazardous wastes are generated from the manufacturing process as well as from a solvent recycling operation. The hazardous wastes generated at this location are stored in containers prior to shipment off-site for treatment or disposal. The drums containing hazardous wastes are stored on impervious concrete and the facility is designed to contain any inadvertent leak or spill. The hazardous wastes generated and stored temporarily at CCF include spent halogenated solvents, spent non-halogenated solvents, residue or still bottoms from recovery of spent non-halogenated sovents, and electroplating sludge.

The CCF application, the U.S. EPA's draft permit and the Statement of Basis are available for public review at the Columbus Public Library, Business and Technology Division, 97 South Grant Street, Columbus, Ohio. These materials and other supporting documents also are available in the administrative record at the U.S. EPA Region V, Waste Management Branch, 230 South Dearborn Street, Chicago 60604 from 9:00 a.m. to 4:30 p.m. weekdays. Contact Michael Ohm at (312) 886-1657.

A public hearing has been requested and will be held July 25, 1984, at the Columbus Public Library, Auditorium, 97 South Grant Street, Columbus, Ohio. The hearing will start at 7:00 p.m. and will continue until all persons that have registered have had an opportunity to present their comments for the record.

In addition, written comments on the application and draft permit will be accepted by U.S. EPA and must be postmarked by August 1, 1984. Comments on the application and draft permit should be sent to Michael Ohm, U.S. EPA Region V, Waste Management Branch, 230 South Dearborn Street, Chicago, Illinois 60604.

After the close of the public comment period, the U.S. EPA will evaluate all comments received before issuing a final permit decision. Notification of the final permit decision will be provided to each person who presented oral testimony, submitted written comments, or requested notice of the decision. Under Title 40 CFR Section 124.17, the U.S. EPA will respond to all significant comments on the draft permit, specify which provisions of the permit were changed, and indicate whether additional documents have been included in the administrative record.

The final decision will also include a reference to the procedures for appealing the decision, (Title 40 Section 124.19). The U.S. EPA's procedures for public comment and hearings are found in 40 CFR Sections 124.11 through 124.13.

PUBLIC HEARING HELD IN COLUMBUS, OHIO, ON THE U.S. EPA'S INTENT TO ISSUE A RCRA PERMIT TO COLUMBUS COATED FABRICS

SIGNIFICANT ACTION MEMO COMMENTS:

On July 25, 1984, the Public Hearing in Columbus, Ohio was attended by 12 people, representing the facility, the City of Columbus, the County of Franklin, and the communication media.

During the formal hearing there was only one speaker who chose to give comments for the record. The speaker represented the Columbus Health Department. As a part of the speaker's comments, he requested an extension of the comment period. The request was granted, and the comment period was extended to August 27, 1984. The hearing was attended by representives of two television stations and one newspaper. The general atmosphere of those in attendance was quiet and orderly.

Contact: Judy Kertcher

353-8512

Lillian Bagus/Arthur Kawatachi/Judy Stone

(Acting Chiefs)

SEPA Environmental NEWS RELEASE

United States
Environmental Protection
Agency
Region V
230 S. Dearborn St.
Chicago, IL 60604

Technical Contact: Michael Ohm (312) 886-1657

Media Contact: Virginia Donohue (312) 886-6694

For Immediate Release: July 3, 1984

No.: 84-157

U.S. EPA TO HOLD PUBLIC HEARING ON RCRA PERMIT FOR COLUMBUS, OHIO, FACILITY

The U.S. Environmental Protection Agency (U.S. EPA) Region V will hold a public hearing and take public comments on the Agency's intent to issue a Resource Conservation and Recovery Act (RCRA) permit to Columbus Coated Fabrics, a division of Borden, Inc., Columbus, Ohio. The permit would allow Columbus Coated Fabrics to continue operating a hazardous waste storage facility at 1280 North Grant St.

The public hearing will be held on July 25, 1984, at Columbus Public Library Auditorium, 96 South Grant St. The hearing will continue until all registered persons have had an opportunity to present their comments for the record.

All speakers should register by 7:30 p.m., limit their oral presentation to 5 minutes and, when possible, also submit their comments in writing.

Comments will be accepted by U.S. EPA through August 1, 1984, and should be sent to Michael Ohm, 5HW-13, U.S. EPA Region V, 230 South Dearborn St., Chicago, IL 60604.

Before taking final action on the permit, the U.S. EPA Region V will give full consideration to all relevant comments received and postmarked by August 1, 1984.

Columbus Coated Fabrics is primarily a manufacturer of decorative vinyl products. Hazardous wastes are generated from the manufacturing process as well as from a solvent recycling operation. The hazardous wastes generated at this location are stored in containers prior to shipment offsite for treatment or disposal. The drums containing hazardous wastes are stored on impervious concrete, and the facility is designed to contain any inadvertent leak or spill. The hazardous wastes generated and stored temporarily at the facility include spent halogenated solvents, spent nonhalogenated solvents, residue or still bottoms from recovery of spent nonhalogenated solvents, and electroplating sludge. Columbus Coated Fabrics has been storing hazardous wastes at the Columbus facility, without incident, since 1978.

Interested persons may review the Columbus Coated Fabrics permit application and U.S. EPA's draft permit at the Columbus Public Library, Business and Technology Division, and at U.S. EPA's Chicago Office. For further information, please contact Michael Ohm, (312) 886-1657.

#

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION V

DATE: July 20, 1984

SUBJECT: Significant Action - Public Hearing on the Intent to Issue a RCRA Permit

FROM: Mike Ohm, RAIU

TO: Karl J. Klepitsch, Jr., Chief Waste Management Branch

> Facility: Columbus Coated Fabrics Division of Borden, Inc. 1280 North Grant Street

Columbus, Ohio

Type of Facility: Storage Facility

Public Notice Date: June 20, 1984

Public Hearing Date and Time: July 25, 1984

7:00 to 9:30 p.m.

Hearing Location: Public Library of Columbus & Franklin County

Business & Technology Division

Auditorium

96 S. Grant Street Columbus, Ohio

Permit Writer: Charles Slaustas

Hearing Officer: April Katsura

Hearing Assistant: Art Kawatachi

Public Notice Contact: Michael Ohm

End of Comment Period: August 6, 1984

Narrative: Please see the attached

cc: C. Christenson

J. Kertcher

Testimony for Columbus Coated Fabrics Public Hearing July 25, 1984

Time:

7:00 P.M.

Location:

97 S. Grant Avenue, Columbus Main Library

In October of 1982, Columbus Coated Fabrics made application to the United States Environmental Protection Agency to establish a hazardous waste storage facility for still bottom waste, dust stop oil, plasticizer residue, and plating pit sludge at its 1280 North Grant Avenue business in Columbus. The U.S.E.P.A. has reviewed this application and determined that it appears to comply with U.S.E.P.A. rules and the application appears to meet the performance standards set forth in Title 40 Part 264. Columbus Coated Fabric's application has also been reviewed by the Environmental Health Division of the Columbus Health Department and other appropriate agencies. In our review we have developed some concerns regarding the protection of the health, safety, and well being of the surrounding community.

Although we are aware of the large quantities of hazardous materials stored at this facility current federal and state laws and this application deals only with hazardous wastes. Therefore our comments are directed solely toward the storage of hazardous waste at this site. Our review of this application has highlighted several deficiencies which we believe must be addressed before a final permit is granted. First, Part 264.37 states that "the owner or operator must attempt to make the following arrangements...(1) arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of hazardous wastes handled at the facility and associated hazards... and (2) arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illness which could result from fires, explosions, or releases at the facility". Although letters of transmittals along with the pertinent sections of the application have been submitted to the above mentioned agencies, to our knowledge no formal arrangements have been agreed upon by these agencies and the applicant as required by Part 264.52. Secondly, the Division of Sewers and Drains have expressed concerns about the containment procedures in the event of a spill outside the hazardous waste storage building. Among the questions raised are the following: (1) is the amount of stored emergency material for such spills adequate for containment, (2) can the manhole in the street where such a spill would be composition is seeded to prevent entry into the city's sewer system, and (3) are the three sections available for spill containment? Although the applicant

states that evacuation of nearby residents is not needed in the event of an emergency at this facility, this department believes that such is not the case. Residential property is within 1000 feet of the site and evacuation procedures might need to be initiated in the event of a fire or an explosion. In addition, three schools are within one kilometer of the plant, their evacuation would be difficult under emergency conditions due to dependence upon public transportation. Lastly, Part 264.16(d) requires "a written description of the type and amount of both introductory and continuing training that will be given to each person filling a hazardous waste management position". This information is lacking in the application.

I would like to address our recommendations at this time. Columbus Health Department desires that an inspection of the site is performed on a quarterly basis. Such a program, whether performed by the Columbus Fire Department, which has agreed to perform this inspection, the U.S.E.P.A., or our department, would help to insure that incompatible wastes would not be stored in close proximity to each other and that the stored containers would be in good condition. Secondly, we recommend that a health assessment survey of the surrounding community be conducted in the event of a fire or an explosion. The extent of any acute exposure from such an incident could then be determined. In addition we recommend environmental monitoring to be performed if a fire or spill does occur. The monitoring might include sampling the air, soil, or water surrounding the site depending on the type and seriousness of the fire or spill. To prevent the contamination of both ground water and public water supplies by the storage of hazardous waste at Columbus Coated Fabrics, we recommend that the Columbus Division of Water in cooperation with Columbus Coated Fabrics conduct a cross connection survey for the facility. We also request that the previously mentioned application deficiencies be corrected or addressed before a final permit is issued. Specifically, we recommend that (1) the contingency plan include arrangements agreed to by local police departments, fire departments, and hospitals as required in Part 264.52, (2) the Division of Sewers and Drains be contacted to discuss other options other than the storm sewer system for spills, (3) Columbus Coated Fabrics acknowledge possible need for evacuation plan of residents, and (4) the application contain a written description of the type and amount of training given to each hazardous waste management personnel as required in Part 264.16. The Columbus Health Department also recommends that Columbus Coated Fabrics notifies the Division of Fire in the event of a spill of 25 gallous or more of a flammable hazardous waste so as to

reduce response time to any emergency. Finally we request that an extension of time be granted for the written comment period as cited in Part 124.12 of Title 40. This extension is needed to perform a thorough review of the application since a copy of the application was not received by our office until July 9, 1984.

In conclusion, the Columbus Health Department believes that an inspection program coupled with detailed contingency plans will help to minimize any adverse impact to the surrounding community. We also request that the above conditions be incorporated within a Memorandum of Understanding between the City of Columbus and the applicant. However if the U.S.E.P.A. does not place these conditions on the permit, then we will oppose the permit and request that it be denied.

RESOURCE CONSERVATION AND RECOVERY ACT
PUBLIC HEARING TO BE HELD ON PROPOSED RCRA PERMIT
FOR COLUMBUS COATED FABRICS FACILITY IN COLUMBUS, OHIO

On Wednesday, July 25, 1984, a public hearing will be held at the Columbus & Franklin County Library Auditorium regarding the permit for Columbus Coated Fabrics' hazardous waste storage facility in Columbus. Columbus Coated Fabrics generates spent solvents or residues in its operation of a small hazardous waste storage facility. Hazardous waste storage occurs only in closed drums in a specially designed drum storage area.

As of this date only one written comment has been received. Mr. Gary Brown, of the Columbus Department of Health, submitted a letter of inquiry requesting technical permit information.

Public comments on the draft permit will be accepted until August 6, 1984.

Contact: L. Bagus (Acting Chief, RAIU)

886-4158

JUN 07 1984

Mr. Dave Urbanski
Business and Technology Division
Columbus Public Library
96 South Grant Street
Columbus, Ohio 43215

Dear Mr. Urbanski:

Per our telephone conversation on May 29, 1984, regarding the intention by the U.S. Environmental Protection Agency (U.S. EPA) Region V to issue a hazardous waste permit to Columbus Coated Fabrics (CCF) in Columbus, Ohio, the following items have been enclosed:

- A copy of the CCF permit application

A copy of the U.S. EPA Region V draft permit for CCF
 A copy of the U.S. EPA Region V Statement of Basis

- A copy of the Public Notice to be published in the Columbus Dispatch on June 20, 1984, advising the availability of these materials in the Columbus library.

- A copy of the U.S. EPA regulations on comment and appeal procedures

Thank you for your assistance in making these materials available to the public for review.

Please retain the materials on file for public access until further notified. I am enclosing postage and fees paid labels for your return of the documents, and will contact you at that time. Also, please let me know that you have received this material by completing and signing the enclosed verification form. The form should be returned to me in the enclosed self-addressed, postage and fees paid envelope.

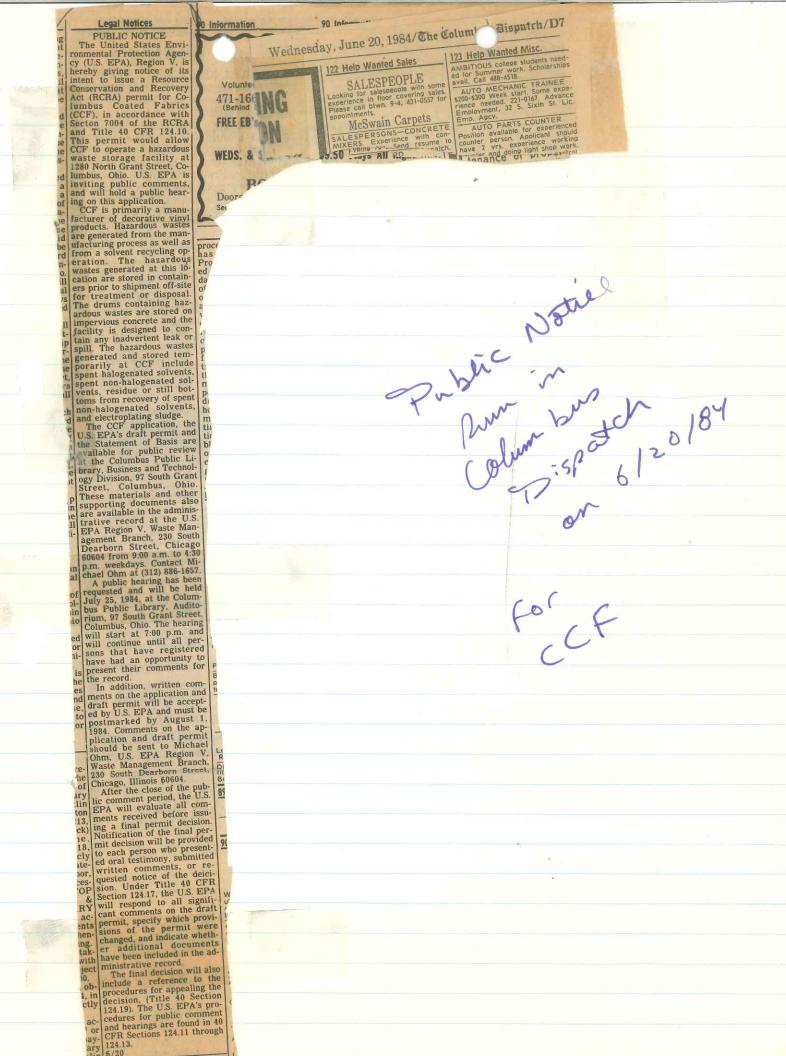
Thank you very much for your cooperation in assisting our effort to serve the public.

Sincerely,

Michael Ohm
Environmental Protection Assistant

Enclosures.

5HW:WMB:RAIU:M.OHM:M.OHM:6/4/84



U.S. ENVIRONMENTAL PROTECTION AGENCY REGION V

NAME AND ADDRESS	APPEALS PROCEDURES	TRANSCRIPT (FEE MAY BE CHARGED)	RESPONSIVENESS SUMMARY & FINAL PERMIT DECISION
**************************************	CHECK IF YOU WISH T	O RECEIVE COPIES OF*	*******
Michael Pompili Columbus Health Depont 181 S. Washington Blud Columbus, Onio 43216	ment		
Columbus Health Dopt. 1815. WASH. BLVD. COLUMBUS OH 42215			
Asst. City Attorney City of Columbus Gow, Broad Columbus, On, 43215	5		
Tom Heaton Borden Inc 165 N. Washington Ave Columbus, Ott 43215		X	

WILL THE HEARING PLEASE COME TO ORDER. GOOD EVENING LADIES AND GENTLEMEN. MY NAME IS APRIL KATSURA, AND I AM THE HEARING OFFICER REPRESENTING THE CHICAGO OFFICE OF THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY. THE PURPOSE OF TONIGHT'S HEARING IS TO RECEIVE YOUR COMMENTS INTO THE RECORD OF U.S. EPA'S INTENT TO ISSUE A RESOURCE CONSERVATION AND RECOVERY ACT PERMIT TO COLUMBUS COATED FABRIC, A DIVISION OF BORDEN INCORPORATED, TO OPERATE A HAZARDOUS WASTE STORAGE FACILITY AT 1280 NORTH GRANT STREET, COLUMBUS, OHIO. WITH ME ON THE PANEL IS CHARLES SLAUSTAS, THE PRIMARY AUTHOR OF U.S. EPA'S DRAFT PERMIT. OUR HEARING ASSISTANT AT THE REGISTRATION TABLE IS ARTHUR KAWATACHI.

UNDER THE RESOURCE CONSERVATION AND RECOVERY ACT, COMMONLY REFERRED TO AS RCRA, U.S. EPA HAS PROMULGATED REGULATIONS TO PROTECT HUMAN HEALTH AND THE ENVIRONMENT FROM THE IMPROPER MANAGEMENT OF HAZARDOUS WASTE. SECTION 3005 OF RCRA, ALONG WITH REGULATIONS FOUND IN TITLE 40 OF THE CODE OF FEDERAL REGULATIONS, ESTABLISH A PERMITTING SYSTEM GOVERNING THE TREATMENT, STORAGE, AND DISPOSAL OF HAZARDOUS WASTE. THESE REGULATIONS ENABLE U.S. EPA TO ISSUE OR DENY PERMITS FOR HAZAROUDS WASTE FACILITIES.

IF A STATE IS AUTHORIZED, UNDER SECTION 3006 OF RCRA, IT MAY ISSUE OR DENY PERMITS IN LIEU OF U.S. EPA. SINCE THE STATE OF OHIO HAS NOT YET RECEIVED THE REQUIRED AUTHORIZATION, U.S. EPA IS RESPONSIBLE FOR MAKING A FINAL DETERMINATION ON THE COLUMBUS COATED FABRIC PERMIT APPLICATION. ADDITIONALLY, COLUMBUS COATED FABRIC MUST MEET ALL STATE REQUIREMENTS AS WELL.

MUST COMPLY WITH ALL OF THE CONDITIONS CONTAINED IN THE PERMIT.

THESE CONDITIONS, IN TURN, MUST SATISFY THE REQUIREMENTS FOUND IN

TITLE 40 OF THE CODE OF FEDERAL REGULATIONS. THESE REQUIREMENTS

INCLUDE: THE PROPER DESIGN, OPERATION, AND MAINTENANCE OF COLUMBUS

COATED FABRIC'S STORAGE FACILITY; ACCIDENT PREVETIONS AND PREPAREDNESS;

CLOSURE; AND FINANCIAL RESPONSIBILITY, AMONG OTHERS.

BEFORE ACCEPTING COMMENTS FROM THE AUDIENCE, MR. SLAUSTAS WILL PRESENT THE BACKGROUND ON COLUMBUS COATED FABRIC'S PERMIT APPLICATION AND U.S. EPA'S DRAFT PERMIT. FOLLOWING THAT, I WILL GIVE YOU A SUMMARY OF U.S. EPA'S PUBLIC PARTICIPATION ACTIVITIES AND REQUIREMENTS, AND WE WILL THEN ACCEPT COMMENTS FROM THE AUDIENCE.

MR. SLAUSTAS.

THANK YOU CHUCK.

U.S. EPA FULLY SUPPORTS RCRA'S MANDATE TO ENCOURAGE PUBLIC PARTICIPATION.

TO BRIEFLY SUMMARIZE U.S. EPA'S PUBLIC PARTICIPATION PROCEDURES,

RCRA REQUIRES THE AGENCY TO NOTICE ITS INTENT TO ISSUE OR DENY A PERMIT

IN A MAJOR LOCAL NEWSPAPER, TO BROADCAST IT OVER A LOCAL RADIO STATION,

AND TO PROVIDE OPPORTUNITY FOR A PUBLIC HEARING. ON JUNE 20, 1984,

U.S. EPA PUBLISHED A PUBLIC NOTICE IN THE COLUMBUS DISPATCH. THE NOTICE

ANNOUNCED THIS PUBLIC HEARING AND ALSO ANNOUNCED THE AVAILABILITY FOR

PUBLIC INSPECTION OF THE AGENCY'S ADMINISTRATIVE RECORD ON COLUMBUS

COATED FABRIC'S PERMIT APPLICATION AND THE AVAILABILITY OF THE DRAFT

PERMIT. RADIO STATIONS WFRD-AM, BROADCASTED NOTICES OF THIS HEARING ON

JUNE 20, 1984.

THE ADMINISTRATIVE RECORD IS AVAILABLE AT U.S. EPA'S OFFICE IN CHICAGO. THIS RECORD INCLUDES: THE PERMIT APPLICATION SUBMITTED BY COLUMBUS COATED FABRIC, U.S. EPA'S DRAFT PERMIT, OUR FACT SHEET, AND OTHER RELATED BACKGROUND DOCUMENTS. IN ADDITION, THE APPLICATION, THE DRAFT PERMIT, AND THE FACT SHEET HAVE BEEN MADE AVAILABLE AT THE COLUMBUS PUBLIC LIBRARY, AT 97 SOUTH GRANT IN COLUMBUS. ALL COMMENTS RECEIVED TONIGHT, WHETHER WRITTEN OR VERBAL, WILL BECOME PART OF THE ADMINSTRATIVE RECORD.

THE CODE OF FEDERAL REGULATIONS REQUIRES THATTHE PUBLIC NOTICE ALLOW FOR A 45-DAY PUBLIC COMMENT PERIOD. THE JUNE 20TH PUBLIC NOTICE AND RADIO ANNOUNCEMENT STATED THAT THE PUBLIC COMMENT PERIOD FOR THIS PERMIT WOULD END ON AUGUST 1, 1984. THIS DATE WAS CALCULATED IN ERROR. THE CORRECT DATE SHOULD HAVE BEEN AUGUST 6, 1984. THEREFORE, THE AGENCY IS HEREBY ANNOUNCING THAT THE PUBLIC COMMENT PERIOD FOR THE AGENCY'S INTENT TO ISSUE A RCRA PERMIT TO COLUMBUS COATED FABRIC, HAS BEEN EXTENDED TO AUGUST 6, 1984. WRITTEN COMMENTS POSTMARKED BY AUGUST 6TH WILL BECOME PART OF THE ADMINISTRATIVE RECORD.

AFTER THE CLOSE OF THE PUBLIC COMMENT PERIOD ON AUGUST 6TH, U.S. EPA WILL EVALUATE ALL INFORMATION RECEIVED, PRIOR TO REACHING A FINAL PERMIT DECISION ON THE APPLICATION. WHEN MAKING ITS FINAL DECISION, U.S. EPA WILL RESPOND TO ALL RELEVANT COMMENTS WHICH HAVE BEEN RECEIVED DURING THE PUBLIC COMMENT PERIOD, INCLUDING THOSE COMMENTS PRESENTED TONIGHT.

IF NEW INFORMATION OR EVIDENCE IS SUBMITTED TO U.S. EPA, AND THE INFORMATION RAISES SUBSTANTIAL NEW QUESTIONS CONCERNING THE DRAFT PERMIT, U.S. EPA MAY PREPARE A NEW DRAFT PERMIT OR A REVISED FACT SHEET. IF THERE IS A NEED FOR SUBSTANTIAL REVISION OF THE ORIGINAL DRAFT PERMIT OR THE AGENCY'S PRELIMINARY PERMIT CONDITIONS, THE COMMENT PERIOD MAY BE EXTENDED OR REOPENED, AND U.S. EPA WILL PUBLISH NOTICE OF THIS FACT IN THE COLUMBUS DISPATCH. IF THE COMMENT PERIOD IS REOPENED OR EXTENDED, U.S. EPA WILL CONSIDER ONLY THOSE COMMENTS WHICH PERTAIN TO THE ISSUES RAISED BY THE NEW INFORMATION OR EVIDENCE.

ALONG WITH THE FINAL PERMIT DECISION, U.S. EPA WILL ISSUE A RESPONSIVENESS SUMMARY, WHICH WILL CONTAIN U.S. EPA'S RESPONSE TO THE RELEVANT COMMENTS WHICH HAVE BEEN RAISED. THE SUMMARY WILL ALSO INDICATE WHICH CONDITIONS, IF ANY, OF THE DRAFT PERMIT WERE CHANGED. U.S. EPA WILL ALSO INDICATE IF ANY ADDITIONAL DOCUMENTS HAVE BEEN INCLUDED IN THE ADMINISTRATIVE RECORD. BOTH U.S. EPA'S FINAL PERMIT DECISION AND RESPONSIVENESS SUMMARY WILL BE INCLUDED IN THE ADMINISTRATIVE RECORD.

NOTIFICATION OF OUR FINAL PERMIT DECISION WILL BE PROVIDED TO COLUMBUS COATED FABRIC AND TO EACH INDIVIDUAL WHO HAS EITHER: PRESENTED ORAL COMMENTS AT THIS HEARING; SUBMITTED WRITTEN COMMENTS; OR REQUESTED NOTICE OF OUR DECISION.

IF YOU FILED COMMENTS ON THIS DRAFT PERMIT, OR PARTICIPATED IN THIS PUBLIC HEARING BY PRESENTING COMMENTS, YOU MAY REQUEST U.S. EPA ADMINISTRATOR, WILLIAM RUCKELSHAUS, TO REVIEW AND RECONSIDER THE FINAL PERMIT DECISION. PERSONS WHO DID NOT FILE COMMENTS ORALLY AT THIS HEARING, OR IN WRITING DURING THE PUBLIC COMMENT PERIOD, MAY REQUEST REVIEW ONLY OF THE CHANGES, IF ANY, U.S. EPA MADE FROM THE DRAFT PERMIT TO THE FINAL PERMIT.

ALL REQUESTS FOR REVIEW MUST BE MADE WITHIN 30 DAYS AFTER THE FINAL PERMIT DECISION HAS BEEN ISSUED AND MUST BE ADDRESSED TO ADMINISTRATOR RUCKELSHAUS IN WASHINGTON. THE SPECIFIC PROCEDURES WHICH YOU MUST FOLLOW IN ORDER TO REQUEST REVIEW WILL BE INCLUDED IN U.S. EPA'S FINAL PERMIT DECISION. COPIES OF THE APPEAL PROCEDURES ARE ALSO AVAILABLE AT THE REGISTRATION TABLE. FOR ANYONE PRESENT WHO DOES NOT PLAN TO SUBMIT ORAL OR WRITTEN COMMENTS, BUT WOULD LIKE TO RECEIVE NOTICE OF U.S. EPA'S FINAL PERMIT DECISION AND RESPONSE TO COMMENTS, THERE IS A SIGN-UP SHEET AT THE REGISTRATION TABLE.

U.S. EPA WILL HAVE A TRANSCRIPT MADE OF TONIGHT'S HEARING. IF YOU WOULD LIKE A COPY OF THE TRANSCRIPT, PLEASE SIGN THE SHEET AT THE REGISTRATION TABLE. IF THE TRANSCRIPT IS 50 PAGES OR MORE, THERE WILL BE A COPYING CHARGE OF 20 CENTS A PAGE. IF YOU HAVE NOT FILLED OUT A SIGN-IN CARD, WE WOULD APPRECIATE YOUR DOING SO BEFORE YOU LEAVE TONIGHT. THE SIGN-IN CARDS ARE ALSO AT THE REGISTRATION TABLE.

I WOULD LIKE TO STRESS AT THIS POINT THAT THE PURPOSE OF TONIGHT'S HEARING IS TO RECEIVE YOUR COMMENTS INTO THE RECORD. U.S. EPA WILL PRESENT ITS OFFICIAL RESPONSE IN THE RESPONSIVENESS SUMMARY.

MR. SLAUSTAS AND I WILL BE AVAILABLE AFTER THIS HEARING TO PROVIDE YOU WITH ANY INFORMATION AVAILABLE.

ALL PERSONS WISHING TO SPEAK TONIGHT SHOULD REGISTER THEIR INTENT ON THE SIGN-IN CARDS. IF YOU DECIDE YOU WANT TO PRESENT COMMENTS, AND HAVE NOT YET INDICATED YOUR INTENT, PLEASE FILL OUT A CARD AND HAND IT TO THE HEARING ASSISTANT. I WILL CALL THE SPEAKERS IN THE ORDER IN WHICH THE REQUESTS TO SPEAK WERE RECEIVED. AS YOUR NAME IS CALLED, PLEASE STEP TO THE PODIUM TO MY . BEFORE YOU BEGIN TO SPEAK, PLEASE GIVE YOUR NAME AND SPELL YOUR LAST NAME FOR THE COURT REPORTER. YOUR COMMENTS, IN WRITTEN FORM, SHOULD BE GIVEN TO THE COURT REPORTER BEFORE YOU BEGIN YOUR PRESENTATION. PLEASE LIMIT YOUR PRESENTATION TO TEN MINUTES. AT THE END OF YOUR PRESENTATION, MR. SLAUSTAS OR I MAY ASK YOU TO CLARIFY SOME OF YOUR COMMENTS.

IF YOU HAVE A PRESENTATION WHICH IS LONGER THAN TEN MINUTES, PLEASE SUMMARIZE YOUR COMMENTS FOR US. YOU MAY SUBMIT LONGER COMMENTS IN WRITING TONIGHT OR ANYTIME BEFORE THE CLOSE OF THE PUBLIC COMMENT PERIOD ON AUGUST 6, 1984.

AT THE END OF YOUR FIVE MINUTES, IF YOU HAVE NOT FINISHED, I WILL ASK
YOU TO CONCLUDE. IF YOU CANNOT FINISH IN THE NEXT MINUTE OR TWO, I WILL
HAVE TO ASK YOU TO SIT DOWN SO THAT THE NEXT SPEAKER CAN BEGIN. WE
APPRECIATE YOUR COOPERATION, SO THAT EVERYONE WHO WISHES TO SPEAK
HAS THE CHANCE TO DO SO.

IF YOU HAVE ANY QUESTIONS ON U.S. EPA'S PROCEDURES, OR ON THE DRAFT PERMIT, MR. SLAUSTAS AND I WILL BE AVAILABLE IMMEDIATELY FOLLOWING THE HEARING.

WE WILL NOW BEGIN TO RECEIVE YOUR COMMENTS. PLEASE REMEMBER TO REPEAT YOUR NAME AND SPELL IT FOR THE REPORTER.

(THANK EACH PERSON)

(READ THE NAMES OF INDIVIDUALS, IF ANY, WHO WERE NOT PRESENT WHEN THEIR NAMES WERE CALLED)

IS THERE ANYONE PRESENT WHO HAS REQU ESTED TO SPEAK, BUT WHOSE NAME HAS NOT BEEN CALLED? IS THERE ANYONE WHO WOULD LIKE TO MAKE A COMMENT?

THANK YOU VERY MUCH FOR YOUR PARTICIPATION IN TONIGHT'S HEARING.
THE HEARING IS ADJOURNED.

I RECOMMEND THAT YOU STATE FOR THE RECORD ANY COMMENTS OR QUESTIONS WHICH YOU MAY HAVE. I WOULD LIKE TO STRESS AT THIS POINT THAT THE PURPOSE OF TONIGHT'S HEARING IS TO COLLECT YOUR COMMENTS AND QUESTIONS. THE AGENCY'S OFFICIAL RESPONSE OR ANSWER TO YOUR QUESTIONS WILL NOT BE PRESENTED THE EVENING BUT THE AGENCY WILL PRESENT ITS OFFICIAL RESPONSE IN THE RESPONSIVENESS SUMMARY. I WOULD LIKE TO REPEAT, THAT THE AGENCY WILL SEND TO YOU, FREE OF CHARGE, A COPY OF ITS RESPONSIVENESS SUMMARY IF YOU SIGN YOUR NAME AND ADDRESS ON THE SHEET ENTITLED "REQUEST FOR RESPONSIVENESS SUMMARY".

MR. AND I WILL BE AVAILABLE DURING BREAKS AND AFTER I ADJOURN THIS HEARING. WE WILL AT THAT TIME ATTEMPT TO PROVIDE YOU WITH ANY INFORMATION WHICH WE CAN.

P.M. WE WILL TAKE A BREAK. THE HEARING WILL REMAIN OPEN UNTIL 7:50 P.M. IF ANYONE ELSE ARRIVES BY THAT TIME, THEY WILL HAVE AN OPPORTUNITY TO MAKE A COMMENT FOR THE RECORD. WE WILL NOW RECESS.

IT IS NOW _____ P.M. THE HEARING WILL RECONVENE. IS THERE ANYONE WHO WOULD LIKE TO MAKE A COMMENT?

THANK YOU VERY MUCH FOR YOUR PARTICIPATION IN TONIGHT'S HEARING. THE HEARING IS ADJOURNED.

FACT SHEET

Columbus Coated Fabrics OHD 004-294-351

I. INTRODUCTION

On May 19, 1980, (45 FR 33066) pursuant to the requirements of Section 3001 through 3006 of the Resource Conservation and Recovery Act, as amended, (RCRA or the Act), the United States Environmental Protection Agency (U.S. EPA) promulgated regulations to protect human health and the environment from the improper management of hazardous waste. Section 3005 of the Act and Code of Federal Regulations, 40 CFR Parts 270 and 124, established a permit system governing the storage of hazardous wastes. Final regulations for storage facilities appeared in the Federal Register of January 12, 1981. These regulations enable U.S. EPA to issue permits for hazardous waste storage facilities in the State of Ohio. A facility which receives a RCRA permit shall comply with U.S. EPA regulations pertaining to design, operation, performance, accident prevention and prepardness, closure and financial responsibility. This Fact Sheet briefly describes the derivation of conditions of the draft permit in support of U.S. EPA's proposal to issue a RCRA permit to Columbus Coated Fabrics, 1280 North Grant Street, Columbus, Ohio to store hazardous wastes.

On December 9, 1983, Columbus Coated Fabrics submitted its revised and complete application for a RCRA permit in accordance with 40 CFR Section 270.14. To receive a RCRA permit, a facility shall demonstrate compliance with applicable technical standards in 40 CFR Part 264 published on May 19, 1980, (45 $\frac{FR}{R}$ 33221) January 12, 1981, (46 $\frac{FR}{R}$ 2848), and January 23, 1981, (46 $\frac{FR}{R}$ 7676), as well as finanical requirements published on April 7, 1982, (47 $\frac{FR}{R}$ 15047) and April 16, 1982, (47 $\frac{FR}{R}$ 16554). After reviewing Columbus Coated Fabric's application, U.S. EPA has tentatively determined that the above standards and requirements have been met. The draft permit condition includes all of these requirements. The preambles to the May 19, 1980; January 12, 1981; January 23, 1981; June 24, 1982, regulations explain the rationale for these requirements.

Also incorporated in the draft permit conditions are requirements for the facility to comply with the terms of its proposed Waste Analysis Plan, Preparedness and Prevention Plan, Personnel Training Plan, and Closure Plan. These items have been determined by U.S. EPA as necessary to comply with the technical standards governing the storage of hazardous waste.

II. FACILITY DESCRIPTION

Columbus Coated Fabrics is located in Columbus, Ohio at 1280 North Grant Street. It is primarily a manufacturer of decorative vinyl products. Hazardous wastes are generated from the manufacturing process as well as from a solvent recycling operation. The hazardous wastes generated at this location are stored in containers prior to shipment off-site for treatment or disposal.

The hazardous wastes generated and stored temporarily at Columbus Coated Fabrics include spent halogenated solvents, spent non-halogenated solvents, residue or still bottoms from recovery of spent non-halogenated solvents, and electroplating sludge.

The hazardous waste storage facility at Columbus Coated Fabrics has a maximum capacity of 24,750 gallons. The drums containing hazardous wastes are stored on impervious concrete and the storage facility is designed to contain any inadvertent leak or spill.

III. SUMMARY OF BASIS FOR PERMIT CONDITIONS

This section of the fact sheet provides a brief summary of the permit conditions in the draft permit. All citations of the regulations refer to the regulation as codified in Title 40 of the Code of Federal Regulations (40 CFR).

A. Standard Permit Conditions

Standard permit conditions I.A to I.G are regulatory requirements of 40 CFR Part 270. These conditions are of a general nature and are applicable to all hazardous waste management facilities regulated pursuant to a U.S. EPA RCRA permit.

B. General Facility Conditions

General facility conditions II.A. to II.Q. are regulatory requirements of 40 CFR Part 264. These conditions are of a general nature and are applicable to all hazardous waste management facilities regulated pursuant to a U.S. EPA RCRA permit.

C. Storage In Containers

Conditions III.A. to III.G. are regulatory requirements of 40 CFR Part 264. These conditions are applicable to all hazardous waste management facility that store hazardous waste in containers pursuant to a U.S. EPA permit.

en e		
Permit Condition	Subject	egulation (40 CFR)
I. STANDARD CONDITIONS		
I.A.	Effect of Permit	§270.4 & 270.30(g)
I.B.	Permit Actions	§270.30(f), 270.41, §270.42, 270.43 & §264.112
I.C.	Severability	Standard Practice
I.D.1.	Duty to Comply	§270.30(a)
I.D.2.	Duty to Reapply	§270.30(b) & 270.10(h)
I.D.3.	Permit Expiration	§270.51
I.D.4.	Need to Halt or Reduce Activity not a Defense	§270.30(c)
I.D.5.	Duty to Mitigate	§270.30(d)
I.D.6.	Proper Operation and Maintenance	§270.30(e)
I.D.7.	Duty to Provide Information	§270.30(h) & 264.74(a)
I.D.8.	Inspection and Entry	§270.30(i)
I.D.9.	Monitoring and Records	§270.30(j)
I.D.10.	Reporting Planned Changes	§270.30(1)(1)
I.D.11.	Certification of Construction or Modification	§270.30(1)(2)
I.D.12.	Anticipated Noncompliance	§270.30(1)(2)
I.D.13.	Transfer of Permits	§270.30(1)(3), 270.40 & §264.12(c)
I.D.14	Compliance Schedules	§270.30(1)(5) & 270.33
I.D.15.	Twenty-Four Hour Reporting	§270.30(1)(6) & 264.56 (d), (i) and (j)
I.D.16.	Other Noncompliance	§270.30(1)(10)
I.D.17.	Other Information	§270.30(1)(11)
I.D.18.	Submittal of Written Reports	§270.30((h)
I.E.	Signatory Requirement	§270.11 & 270.30(k)
I.F.	Confidential Information	§270.12
I.G.	Documents to be Maintained at Facility Site	§264.13(b), 264.16(d) §264.53(a), 264.122(a) §264.142(a), 264.73,

§264.13(b), 264.16(d) §264.53(a), 264.122(a) §264.142(a), 264.73, §264.15(b)

Permit Condition		Regulation (40 CFR)
II. GENERAL FACILITY CONDITIONS		
II.A.	Design and Operation of Facility	§264.31
II.B.	Required Notice	\$264.12
II.C.	General Waste Analysis	§264.13
II.D.	Security	§264.14
II.E.	General Inspection Requirements	§264.15
II.F.	Personnel Training	§264.16
II.G.	General Requirements for Ignitable, Reactive and Incompatible Waste	§264.17
II.H.	Preparedness and Prevention	
II.H.1.	Required Equipment	§264.32
II.H.2.	Testing and Maintenance of Equipment	§264.33
II.H.3.	Access to Communications or Alarm System	§264 . 34
II.H.4.	Required Aisle Space	§264.35
II.H.5.	Arrangements with Local Authorities	§264 . 37
II.I.	Contingency Plan	
II.I.1.	Implementation of Contingency Plan	§264 . 51
II.I.2.	Copies of the Contingency Plan	§264 . 53
11.1.3.	Amendments to the Contingend	cy §264.54
II.I.4.	Emergency Coordinator	§264.55
II.J.	Manifest System	§264.71, §264.72 §264.76, §270.30(1)(7), §270.30(1)(8)
II.K.1.	Operating Record	§264.73
II.K.2.	Biennial Report	§264.75, §270.30(1)(g)

Permit Condition	Subject	Regulation (40 CFR)
II.L.1.	Closure Performance Standard	§264 . 111
II.L.2.	Amendment to Closure Plan	§264.112(b)
II.L.3.	Notification of Closure	§264.112(c)
II.L.4.	Time Allowed for Closure	§264.113
II.L.5.	Disposal or Decontamination of Equipment	§264.114
I.L.6.	Certification of Closure	§264.115
II.M.	Closure Cost Estimate	§264.142
II.N.	Financial Assurance for Facility Closure	§264.143
II.O.	Liability Requirements	§264.147
II.P.	Incapacity of Owners or Operators, Generators or Financial Institutions	§264 . 148
II.Q	Financial Assurance and Documentation Requirements	§264 . 149

Waste permit protested

A federal EPA hazardous waste storage permit will not give Columbus residents adequate protection. Columbus Health Department officials said today.

Assistant Health Commissioner Michael J. Pompili said the city will file an appeal with the U.S. EPA, seeking stricter controls over the storage of hazardeus waste at the Columbus Coated Fabrics Co., 1280 N. Grant Ave. The company is a subsidiary of Borden Inc.

The Environmental Protection Agency has notified health officials that their request for stricter standards was rejected.
The department has until Sunday to appeal

Pompili said the proposed federal permit has no arrangements to familiarize local emergency teams with the plant.

Pompili said city health officials have been negotiating to get Borden to voluntarily accept stiffer standards.

OHIO NEWS BUREAU INC. CLEVELAND, OHIO 44115 216, 241-0675

> COLUMBUS CALL & POST COLUMBUS, O. W (BLACK) - CIBIC 12,500

SEP-27-84 City health department monitors chemical plants

There are 308 hazardous waste locations in Franklin County, some as small as gas stations that handle spent solstations that handle spent sol-, vent, according to Michael J. Pompili, assistant health commissioner for environmental health, city of Columbus.

Pompili reports that there

are 41 hazardous waste generators in Franklin County that are exempt from licenaing if the waste is stored less than 90

days.
Hazardous waste is defined as such if it is listed in the Resource Conservation and Recovery Act (RCRA) of 1978 regulations or exhibits at least وأجواعا وريسالها

one of four of the following characteristics: Ignitability. have met with and developed corrosiveness reactivity (for explosiveness) or toxicity.

The residents of the Marionexplosiveness) or toxicity.
The residents of the Marion

The residents of the Marion-Frankin area are comcerned; about three chamical plants in the neighborhood that store; hazardous waste. The plants are: Georgia Pacific, 1975 Wat-kins Rd.; McKesson Chemical., 1785 E. Holes & H. and De Sone. kins Hd.; McResson Chemical. 1795 E. Holer Rd.; and De Solo. Inc., 2121 New World Dr.

inc., 2121 New World Dr.
Recent chemical releases.
Iron one or more of the plants
have caused neighborhood
concern and brought the
Columbus Health Cept., the
residents, and representatives
of the chemical plants at loggerheads; "It be important to
notar," promultands be CALLA nasa, Parenill to ke The CALLA

He said that they are comtrolled by Ohio Environmental
Prefection Agency and the
U.S. Environmental Protection
Agency (EPA).
Frankiln County Commissioner Fran Ryan said, "As a
county commissioner, I surport stronger federal and state
EPA laws. I have contacted the
Ohio EPA about the situation.
Pompili said that the city
health department. Is somewhat caught batween the
neighborhood residents, saids
afth federal BPA, and the charge
list phares.

Am memorial start of the offernal inch particular of under standing was developed recently between the Georgia Pacific Co. and the Columbus Health Dept. that has some neighborhood residents concerned about the tack of citteen input in the development of the input in the development of the memorandum.

input in the development of the memorandum.
"Health department representatives have attended two or three meetings in the neighborhood," Pempili noted. "We have heard their concerns and definitioly had them in mind when the memorandum, was developed."

He anid he did not understand their complaint.
The memorandum included some of the following points:
—Ground water will be monitored through April 1986.
—The health department will be informed of all communication between Ohio EPA and Georgia Pacilic that is directed toward preventing future

toward preventing future incidents;

--Quarterly inspections will --Quarterly inspections will be conducted by the fire Dept. to examine condition, storage, labeling, and separation of containers. Health department and Georgia Pacific will receive copies of inspection --Results of hazardous waste sampling with be sent to the dw-

--Results of hazardous waste sampling will be sent to the division of sewers and drains;
--No incompatible wastes will be stored in proximity to sech other.

each other;

ench other.
Georgia Pacific will conduct a thorough engineering review and the city will be informed of its outcome.
The city health department has also developed an agreement with DeSoto, Inc. Some

inent with DeSoto, Inc. Some of the points in that memorandum include:

--A chemical analysis of DeSoto, Inc.'s hazardous wasta with be transmitted to the

sewers and drains division

once per calendar year:

-DeSoto, agrees to submit
to an inspection by either the
U.S. EPA, the Chio EPA or the
Columbus Fire Dept. on a quar-

Columbus Fire Dept. on a quarterly basis;

-DeSoto agrees to comply with all applicable regulations regarding the storage of incompatible waste at the

facilities.
Following are the major points of agreement from the McKesson Chemical memoran-

Columbus: Fire Dept. or that Ohio EPA:
—In the event of an incident involving hazardous waste, McKesson, the health department will concuct a health assessment of the modant:
—McKesson will maintain or install low pressure antibackflow devices in the water supply to the facility.

A final draft has been prepared of an evaculation plan, according to Gary Brown, whose chief responsibility in the health department is with nazardous waste. nazardous waste.

nazardous waste.

He said that the planning committee is reviewing the final draft and is expected to reconvene within two weeks to

reconvene within two weeps accept the report.

The evacuation plan is being developed by the Columbus Health Dept., Fire Dept., Police Dept., Franklin County Disaster Services Agency, and the American Red Cross.

American ned cross.

Pompili said he believes that stronger and clearer EPA guides should be developed on both the state and federal

Tight controls at toxic waste plant urged by official

By Janet A. Pearl
Dispatch Staff Reporter

An official of the Columbus Health Department asked Wednesday for tight federal controls on a hazardous waste storage facility at 1280 N. Grant Ave.

Michael J. Pompili, the city's assistant health commissioner, was the lone speaker Wednesday at a public hearing about a proposed permit to allow Columbus Coated Fabrics Co. to continue operating.

Protection Agency held the hearing to gauge public reaction to its intent to issue a Resource Conservation and Recovery Act permit to the company, a subsidiary of Borden Inc. Fewer than 10 people gathered in the auditorium of the main branch of the Public Library of Columbus and Franklin County for the hearing.

Pompili read a statement highlighting what he called plant deficiencies. He also called for an extended deadline for the public to respond in writing about the proposed permit.

"We want an acknowledgement that evacuation might be necessary," Pompili said.

He called for quarterly inspections of the site, and said the company should make a presentation to familiarize public safety officials and hospitals with the plant layout and types

of illnesses and injuries that could occur from handling the hazardous wastes.

Pompili also said the permit application did not include written description of the training to be given employees handling a hazardous waste emergency.

TOM HEATON, environmental specialist at Borden's corporate office, said after the meeting that Columbus Coated Fabricst, which produces decorative vinyl wall coverings, expected to receive a written request from Pompili today and will probably schedule a meeting with the health department.

EPA spokesman Charles Slaustas said, "Columbus Coated Fabrics does not have to reach an agreement with the health department for a permit to be issued."

The deadline to receive written responses on the permit was extended from Aug. 1 until Aug. 27. Comments should be sent to Michael Ohm, U.S. EPA Region V, Waste Management Branch, 230 S. Dearborn St., Chicago, Ill. 60604.

Slaustas said the plant has a maximum storage capacity of 24,750 gallons of hazardous waste, and the permit would require the plant to follow more stringent regulations.

The decision on the permit will be made about Sept. 15, he said.

BORDEN INC

165 N. WASHINGTON AVENUE, COLUMBUS, OHIO 43215 TELEPHONE: (614) 225-4292

April 11, 1985



W. BAILEY BARTON
DIRECTOR
ENVIRONMENTAL AFFAIRS

Roger Grimes, Esq. Assistant Regional Counsel USEPA - Region V 230 S. Dearborn Street Chicago, IL 60604

> Re: Columbus Coated Fabrics Columbus, OH - OHD 004-294-341

Dear Mr. Grimes:

Borden Inc. appreciates your forwarding a copy of USEPA Region V's response to the City of Columbus' Health Department's Petition for Review of our Columbus Coated Fabrics RCRA permit.

Borden cannot let the statement in your letter (p. 2 first paragraph, last sentence) that "Columbus Coated Fabrics apparently did not follow through on its statements that it had supplied the various local entities with copies of its contingency plan"...pass without comment.

Attachment 1 pages 83b-83i are copies of our transmittal letters to the various agencies. Note that the documents transmitted are specifically identified as "Spill Prevention Control and Countermeasure Plan" and "Emergency Action Plan" and were supplied to comply with RCRA regulations. There were seven (7) addressee hospitals and emergency agencies so supplied.

Edith Ardiente's inquiry letters, Attachment's 9, 10 and 11, evidently went to only three of our seven addressees and asked about a "Contingency Plan". Also evidently, only two replies were received (Attachments 12 and 13). In the latter, Chief Woltz says he never received a "Contingency Plan"...but did receive, on June 7, 1982 a "Spill Prevention Control and Countermeasures Plan" and "Emergency Action Plan".

Columbus Fire Department, therefore, <u>did receive</u> precisely as we represented to USEPA, what we expressly stated we had sent to comply with RCRA. Chief Woltz, prior to our meeting with him on March 21, 1985, had never notified

Roger Grimes, USErA Page 2 April 11, 1985

Columbus Coated Fabrics of "his" interpretation of 40 CFR Part 264.37 and 264.52. Columbus Coated Fabrics had every reason to believe that following our June 7, 1982 notice, Columbus Fire Department would have incorporated into its, then quarterly, inspections of our plant a review of hazardous waste facilities.

In our meeting of March 21, 1985, Chief Woltz agreed to arrange familiarization tours for his personnel with our Brigade Fire Chief. Hopefully this issue has now been resolved.

We would note in passing that while the 1984 alarms recorded by Chief Woltz are accurate, the Columbus Fire Department is automatically summoned when a fire of significant size or duration occurs within our facility. Columbus Fire Department has on only one occasion assisted our Fire Brigade in extinguishing a fire at Columbus Coated Fabrics on (5/2/84). In all other cases our Fire Brigade has extinguished the fire prior to the arrival of Columbus Fire Department.

As to the Grant Hospital response (Attachment 12), our own investigation revealed that Mr. Ilg received a call in January 1985 from a Grant Hospital employee in the Building and Grounds department regarding his receipt of our Ms. Ardiente's letter and requesting instructions. He was told to forward it to personnel at the Hospital responsible for such matters so they could search their files and report. In March 1985, Mr. Ilg checked back with that employee who advised that "a lot of things were misplaced when Grant Hospital moved its Administration offices in 1983". Mr. Ilg also talked to Brian Saul, author of Attachment 12 who advised that much had changed at Grant since 1982 and the transmittal could have been received - it simply was not in the Safety Directors or the Emergency Room File. Mr. Saul is Grant's third Safety Director in the past three years.

To remedy any such misplacement of our document, we sent - this time by certified mail - revised copies of our plans to the same seven (7) addressees in early March 1985. We are also assembling Material Safety Data Sheets on all raw materials which subsequently may appear in our hazardous waste for transmittal to all addressees.

Borden has no objection to review of our RCRA permit or of our Plans submitted pursuant to the RCRA regulations. We do, however, want to set the record straight that we did not

Roger Grimes, USE...
Page 3
April 11, 1985

"apparently fail to follow through" on submittal of the Plans to the various agencies as alleged in your letter. If the evidence provided in your response is supposed to be the basis for granting the Review Petition, it is indeed an insubstantial basis. However, if the USEPA is suggesting that Borden' Columbus Coated Fabrics has some duty other than transmittal of our Plan's, then that may fairly be an issue for review. I'm sure that not only Borden, but many other Part B Permit applicants, would be interested in finding out what 40 CFR §264.37 really means.

I am copying Ms. Wolfson with this letter in the hope that Borden's Columbus Coated Fabrics may also have input into shaping the issues to be inquired into in such a review.

Very truly yours,

W. Bailey Barton

WBB/slw/20.55

cc: Ms. Paulette Wolfson, Judicial Oficer
USEPA
401 M Street, S.W.
Washington, D.C. 20460

Eileen A. Groves Assistant City Attorney City of Columbus

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

GREGORY S. LASHUTKA

CURTIS F. GANTZ

PATRICK M. McGRATH

RONALD J. O'BRIEN
CHIEF PROSECUTOR

DONALD PLANK

CHIEF REAL ESTATE ATTORNEY

DONALD R. KELLER
CHIEF LABOR LAW ATTORNEY

D. EDGAR BARKELOO DAVID F. BECK ROBERT A. BELL DAVID M. BUCHMAN JAMES J. FAIS H. WILLIAM POLLITT, JR.

DEBORAH D. PRYCE
SENIOR ASSISTANT CITY ATTORNEYS



CITY OF COLUMBUS

OHIO

DEPARTMENT OF LAW

CIVIL DIVISION

90 WEST BROAD STREET
COLUMBUS. OHIO 43215 E V E

222November 2, 1984

SCOT E. DEWHIRST DANIEL W. DRAKE DEBORAH EVERSON MELINDA J. FRANK EILEEN P. FRIEDMAN LAWRENCE A. GARLINGER BARBARA A. GATES TERRENCE A. GRADY **EILEEN A. GROVES** DEBORAH F. HOFFMAN DAVID W. INSLEY JOHN C. KLEIN ROBERT B. LEVERING JAMES R. MARTIN MICHAEL C. MATUSKA MARCEE C. McCREARY LAWRENCE B. MUSCARELLA RUSSELL L. NEEDELL **GUY L. REECE II** W. JAMES SIKA LAURA R. STITT DAVID E. TINGLEY JAMES N. TRIFELOS JAMES D. VIETS ASSISTANT CITY ATTORNEYS

CERTIFIED MAIL

Mr. William Ruckelshaus Administrator, U.S. EPA 401 M Street S.W. Washington, D.C. 20460

Attn:

Ronald McCallum (A-101)

Judicial Officer

Re:

Columbus Coated Fabrics, Columbus, Ohio

U.S EPA Id.# OHD 004-294-331

WASTE MANAGEMENT BRANCH

RECEIVED

NOV 5 1984

WASTE MANAGEMENT DIVISION
OFFICE OF THE DIRECTOR

Petition For Review

The City of Columbus, the Columbus Health Department and the Department of Public Safety petition the Administration of the U.S. EPA for a review of the Resource Conservation Recovery Act (RCRA) hazardous waste management permit decision of U.S. EPA Region 5 of the above-captioned applicant. The petition for review is filed pursuant to 40 CFR 124.19.

On July 25, 1984, at the public hearing relating to the above-captioned application, Mr. Michael Pompili of the Columbus Health Department raised certain issues. In particular, the Health Department pointed out that contrary to the statements made in the application, no formal arrangement had been made by Columbus Coated Fabrics to familiarize police, fire and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazardous places where facility personnel would normally be working, entrances to and roads within the facility nor possible evacuation routes.

Region 5 in its response to this issue stated:

In order to familiarize the local fire, police, and hospital representatives with the properties of the hazardous waste handled by the facility, as well as fire and emergency evacuation routes at the facility, a copy of the contingency plan was submitted to each

of these organizations by Columbus Coated Fabrics. In addition, any updates of the contingency plan will be forwarded to these organizations. Also, recent conversations between this Agency and representatives of Columbus Coated Fabrics indicated that members of the Columbus Fire Department visit the facility every six months for familiarization and/or inspection purposes. Since the provisions of 40 CFR 264.37 do not require that agreements be signed with the police and fire departments when a single police and single fire department might respond to an emergency, the regulatory requirements have been satisfied.

(Emphasis added.)

CCF forwarded to the Fire Chief over three years ago a copy of their contingency plan. No updates have been issued to safety agencies. Neither have there been any contacts for familiarization with appropriate City safety forces. There have been no meetings with management and fire personnel nor any on-site training exercises as recommended in the "Permit Applicant's Guide" (SW-968). While some Fire personnel may inspect the facility periodically for fire hazards as is typical with any commercial establishment, this inspection does not meet the intent of familiarization and/or inspection of the EPA regulations.

The Department of Public Safety, Division of Fire feels that the degree of familiarization inspection and knowledge of the hazardous waste operation at CCF is inadequate.

The petitioners feel that the Findings of Fact of Mr. Constantelos, Director, Waste Management Division, was clearly erroneous because it was based upon incorrect information supplied by the applicant and was an abuse of discretion because his decision was based upon verbal statements made by the applicant outside the administrative record and upon an ex parte basis.

The City of Columbus, the Columbus Health Department and the Department of Public Safety respectfully request that the Administrator of the U.S EPA review this permit application and the final decision to issue a RCRA hazardous waste management facility permit to Columbus Coated FAbrics by Mr. Constantelos.

Yours truly,

Eileen A. Groves

Assistant City Attorney

EAG:klm

cc: Board of Health, Commissioner Myers
Public Safety, Chief Waltz
Region 5
CCF - Barton Bailey